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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

DEMOCRATIC NATIONAL
COMMITTEE,
et al.,

Plaintiffs,

v.

REPUBLICAN NATIONAL
COMMITTEE,
et al.,

Defendants.

)
) Civil Action No. 81-3876
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) JUDGE DICKINSON R.
) DEBEVOISE
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**MEMORANDUM IN SUPPORT OF INTERVENOR'S MOTION
FOR A PRELIMINARY INJUNCTION**

Date of Argument: November 1, 2004

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U.S. DISTRICT COURT
DISTRICT OF NEW JERSEY

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INTRODUCTION

Intervenor submits this Memorandum to address the three issues raised by the Court on October 29, 2004. These issues are: (1) the RNC's participation in the efforts to use lists of returned mail to challenge newly registered voters; (2) whether these voter challenge efforts will have a disparate impact on racial or ethnic minorities; and (3) whether such challenges will clog the voting process on election day in predominately minority precincts, and intimidate and disenfranchise minority voters.

I. THE RNC PARTICIPATED ACTIVELY IN THE EFFORT TO USE LISTS OF RETURNED MAIL TO CHALLENGE NEWLY REGISTERED VOTERS

The evidence shows convincingly that the Defendant Republican National Committee ("RNC") participated actively in a joint effort with the Ohio Republican Party ("Ohio RP") to use returned mailings to challenge the rights of thousands of newly registered voters to cast their ballots in the upcoming election.

The joint effort was done to combat "vote fraud" and was thus a "ballot security effort" under paragraph A of the 1987 Consent Decree, for which prior approval from this Court was required. Indeed, both the original Consent Decree entered in 1982 and the second Consent Decree entered in 1987, arose out of mass mailings to registered voters and the use of returned undelivered mail to develop lists to challenge voters.

On August 10, 2004, the RNC mailed over 49,000 letters to newly registered voters in Cuyahoga County, Ohio (Cleveland). (Ex. 1, Cino Dec. at ¶ 4; Ex. 2, Cino Dep. Tr. at 75:5-7). The mailing was done by the RNC. (Cino Dep. Tr. at 75:19-22.) But it was done in such a way that the undeliverable mail was returned not to the RNC, but to the *Ohio RP*. (*Id.*)

There were 3,353 letters from this mailing that were returned undelivered. (*Id.* at 75:8-10.) The Ohio RP made a list of them and sent it to the RNC, so that both the RNC and the Ohio RP had the list. (Cino Dep. Tr. at 75:11-76:3, 102:11-19.) The RNC claims that the purpose of the mailing was simply to “welcome all newly-registered voters in Cuyahoga County.” (Cino Dec. at ¶ 4.) But when this list of undelivered mail was received by the RNC, the RNC analyzed it for *voter fraud*. (Cino Dep. Tr. at 79:5-15.) This is made clear by the lists themselves. We attach hereto as Exhibits 3, 4, 5 and 6, lists and analyses of lists made by the RNC of the voters whose mail was returned undelivered. (Cino Dep. Tr. at 82:18.) Exhibit 3 is a list of about 950 names and addresses sorted by zip code. It shows an “info key” with designations “CF (couldn’t find); VR (verified address); P (photo); B (business); O (other).” (*Id.*) And Exhibit 3 bears the note on its first page: “OH Highly Suspicious.”

The RNC’s Rule 30(b)(6) witness, Maria Cino, Deputy Chairman of the RNC, admitted that RNC personnel took the list and tried to develop proof of vote fraud. (Cino Dep. Tr. at 84:15-85:1.)¹ People were sent to look at, or photograph, the addresses to determine whether the voter lived at the address given. (Cino Dep. Tr. at 87:7-13, 88:21-22.) The results of these investigations are recorded in the lists opposite the voter’s name under a column headed “INFO/NOTES.” (*See* Exs. 3, 5 and 6).

This document reflects that, after reviewing 950 of the voters, the RNC concluded that 50-80 were “suspicious” and 10 were “highly suspicious.” (Ex. 4;

¹ At times Ms. Cino, the Deputy Chair of the RNC and the 30(b)(6) witness, tried to avoid the word “fraud,” and used the phrase “voter irregularities.” (Cino Dep. at 84:15-18, 85:12-15) But after being confronted with the lists, she acknowledged, that the RNC was looking for “vote fraud.” (Cino Dep. at 85:1).

Cino Dep. Tr. at 94:7-12.)² Thus, although the RNC has tried to depict their mass mailing as an effort to woo new voters, and “collect data” (Cino Dep. Tr. at 81), it was plainly also part of an effort to develop a basis to challenge voters. And Ms. Cino conceded this fact after being confronted with the lists, although she maintained that the vote fraud information would be used only after the election. (*See, e.g.*, Cino Dep. Tr. at 88:8-12; 124.)

Then on September 9, 2004, the Ohio RP did an expanded mass mailing, using the exact same letter that the RNC had used in August. (Cino Dec. Exs. 3, 4).³ These letters were sent not only to newly registered voters in Cuyahoga County (Cleveland), but also to newly registered voters in Franklin County (Columbus), Summit County (Akron), Hamilton County (Cincinnati), and Montgomery County (Dayton). (Cino Dec. at ¶ 5.)

The Ohio RP received back 15,238 of these letters as undeliverable. (Cino Dec. at ¶ 5.) This information was shared with the RNC, and the list of these voters was prepared and sent by the Ohio RP to the RNC. (Cino Dep. Tr. at 75:11-76:3, 102:11-19; 106.) Ms. Cino testified that people at the RNC thought this volume of returned mail might be evidence of voter fraud, but that they were aware of the consent decree, thought that they could not use the lists for any purpose, and were warned not to discuss it. (Cino Dep. Tr. at 106-107; 108-109.)

² The document bears the heading “Highly Suspicious List – Ohio”. There were from seventeen to twenty others mass mailings to newly registered voters in other “battleground” states (Cino Dep. Tr. at 74); and we infer other highly suspicious lists were done for these other states.

³ The letters differed only in that the Ohio RP letter was signed by the Ohio RP instead of the RNC. As already mentioned, the letters in both mailings bore the return address of the Ohio RP.

This second list was produced to Intervenor by the RNC after the Cino deposition, and it turns out to have been subject to the same kind of “vote fraud” analysis as the first list -- the one made up from the mailing done by the RNC. The second list, separated by county. It is also sorted by zip code. Like the first list, this list reflects that further investigation has been done with regard to some of the voters. And notations such as “no mail receptacle,” “moved” and “vacant” appear in a column headed “other comments” opposite the listed voter’s name.

Thus, in August the RNC sent out a mass mailing which it used to look for vote fraud, and shared the results with the Ohio RP. And in September the Ohio RP sent out a larger mass mailing and shared the results with the RNC, which the RNC used to look for vote fraud.

Ms. Cino testified repeatedly that RNC personnel did not discuss vote fraud with the Ohio RP because the Consent Decree forbade it from doing so. (Cino Dep. Tr. at 47) (“due to the fact that we signed the consent decree, that is something we could not be involved in”); (Cino Dep. Tr. at 28) (RNC has not tried to develop any “strategies” to combat vote fraud “because of the consent decree”); (Cino Dep. Tr. 109) (RNC aware of the consent decree and was “warned not to discuss” doing something about voter irregularities.) However, emails produced at the very end of the deposition seem to show that RNC personnel were discussing voter fraud strategies on a regular basis, among themselves, and with state party officials including officials in Ohio.

These emails are collected in Exhibit 7 hereto. Exhibit 7 contains several emails with the subject line “Voter Reg. Fraud Strategy conference calls.” (Ex. 7, RNC000179 – RNC000185.) One is dated September 30, 2004, well after lists had been compiled and analyzed from both mailings – the RNC mailing and the Ohio RP mailing. (See Ex. 10, RNC000184-185; Cino Dep. Tr. at 145:2.) This email is from an RNC official and it states:

“Team,

We’ve been asked to schedule the remaining HAVA/Voter Reg Fraud Strategy conference calls by Week’s end.

NV

OH

NM

PA”

It is clear that the Ohio RP was to be a part of the strategy call because the e-mail also states:

“RNC Coordinators – Please discern the *State Chairman’s* availability”
Ex. 7 (emphasis added.).

Moreover, there are numerous other emails in Exhibit 7 that bear the subject line “Cuyahoga Returned List.” These are sent or received on October 5, 2004 shortly before the decision was made to make a massive challenge list. These emails clearly reflect conversations about efforts to combat “voter fraud”, that if carried out would be covered by the pre-approval requirement of the second consent decree. These emails reflect that RNC personnel have received the returned mailing list from the Cuyahoga County’s Election Board’s own mailing.⁴ And the RNC personnel discussed voter fraud strategy with officers of the Ohio RP and with the Bush campaign.⁵

Several emails suggest cross-checking requests for absentee ballots against the list of returned mail in NV, FL, PA and NM as well as Ohio. These emails are sent to officials of both the RNC and the Ohio RP. (*See, e.g.*, Ex. 8 at RNC000172) (emails from and to representatives of the RNC, the Ohio RP and Bush-Cheney ‘04).

⁴ *See, e.g.*, Ex. 7, RNC000173 (email at bottom of page).

⁵ *See, e.g.*, Ex. 7, RNC000173, email October 5, 2004 from Shawn Reinschmiedt of the RNC to Mike Magan and a Mr. Mauk of the Ohio RP and others.

A later email from Mr. Griffin, head of Research/Communications for the RNC, states:

“Chris MC says this:

Jack Christopher and I have already tasked our IT person with creating a match list between the BoE [Board of Elections] return mail list and the AB request list . . . I can’t speak to the other states, but if they don’t have flagged voter rolls, *we run the risk of having GOP fingerprints . . .*” (Ex. 8, RNC000152) (emphasis added.)

Ms. Cino said she did not know about these emails until shortly before the deposition. (Cino Dep. Tr. at 146:16-147:2.) And she had never questioned any of these people about voter registration strategy calls they may have had with the Ohio RP. (Cino Dep. Tr. at 146.)

In any event, according to the declaration of Ms. Cino, the Ohio RP, beginning on or about October 7, 2004, obtained lists of mail sent by the Ohio County Board of Elections to new registrants that had been returned undeliverable. (Cino Dec. ¶ 6.) According to Ms. Cino, the Republican Party of Ohio then challenged some 35,000 newly registered voters whose mail was returned, based “*primarily on the County Board of Elections Mailings.*” (Cino Dec. ¶ 10.) She denied that the Ohio RP’s own mailings had been used, and denied any collaboration with the RNC. (Cino Dec. ¶ 6.)

However, the *Washington Post* reported on October 23, 2004 that “[t]he Ohio Republican Party challenged the eligibility of 35,000 newly registered voters yesterday.” (*See* Ex. 9). The article states that “most of the 35,000 voters live in urban, Democratic areas, party spokesman Jason Mark said.” (*Id.*) Then the article reports that “[l]ocal party officials, joined by Republican National Committee Chairman Ed Gillespie at a news conference, said the voters were mainly registered by “shadowy” Democratic-leaning groups and were chosen after *the GOP sent them*

mail that was returned as undeliverable.” (emphasis added). Ms. Cino confirmed the accuracy of this news report. (Cino Dep. Tr. at 44:18.)

Similarly, a press release issued on October 22, 2004, by the Ohio RP confirmed the 35,000 challenges, and claimed that they were based on mail returned *to the party*. The press release says:

Bennett [Ohio RP Chair] was joined at a news conference earlier this week by Republican National Committee Chairman Ed Gillespie, where he *displayed thousands of pieces of undeliverable mail* to newly registered voters. The mail was *returned to the party* at an unprecedented rate

(Ex. 10 (emphasis added)).

Ms. Cino relied mostly on news articles to support her testimony that the Ohio RP had not used its own mailing to develop its challenge list. She had not spoken to anyone at the Ohio RP. (Cino Dep. Tr. at 67:22-69:3.) But the news articles quoted from above suggest that the mailings used to develop the list had been sent by the party.

Regardless of whose set of returned-as-undeliverable mail was used to develop the list, the evidence convincingly shows coordination between the RNC and the Ohio RP, and it shows “participation” and “assistance” by the RNC in the efforts to identify and challenge newly registered voters. These actions are in direct violation of the consent decree, and, as set forth below, they have a disparate impact on minority voters.

The RNC and the Ohio RP obtained lists of returned mail from newly registered voters in August and September and shared those lists with each other. The RNC analyzed both for voter fraud. Contrary to the claim by the 30(b)(6) witness that the RNC and the Ohio RP never spoke to each other about vote fraud strategy, there are numerous e-mails showing that they did. The 30(b)(6) witness

just never talked to the people who sent and received them. And at a mid-October press conference the RNC Chair and the Ohio RP Chair jointly announced the plan to challenge 35,000 voters based on returned mail.

The RNC participated in the plan to develop lists of newly registered voters whose mail was returned undelivered and to challenge those voters.

II. THE CHALLENGES ARE OVERBROAD AND HAVE A DISPARATE IMPACT ON MINORITY RACIAL AND ETHNIC GROUPS

A. Overbreadth

The fact that a person's mail is returned undelivered does not mean that the person is ineligible to vote. It may mean that the person has changed his or her address, or is transient. But it does not by any stretch provide a basis for concluding that the voter is ineligible to vote.

This point was starkly illustrated during the recent hearings that were triggered by the *pre-election* challenges to the 35,000 voters. The challenged voter testified that mail was properly delivered to the correct address, but that she refused the mail. (*See* Ex. 11, Summit County Hearing Tr. at 12:21-13:2.) The challenger then tried to explain why she had made the challenge. But she could not. She testified that her sole basis for challenging the voter was the fact that she was told by a Republican Party official that the mail was returned as undeliverable. (*Id.* at 6:5-6:20.) The challenger had never been to the voter's residence, did not know who the challenged voter was, did not send any mail to the challenged voter, and never even saw any mail that was returned as undelivered. (*Id.* at 5:6-7:7.)

Mr. Pry [Summit County Board of Elections Member]: Now, you've Indicated that you signed this based on some personal knowledge.

Mr. Hutchinson [BOE Member]: No.

Mr. Arshinkoff [BOE Member]: Reason to believe. It says, "I have reason to believe." It says it on the form.
Mr. Jones [BOE Member]: It says, "I hereby declare under penalty of election Falsification, that the statements above are true as I verily believe."
Mr. Arshinkoff: It says here, "I have reason to believe."
Mr. Hutchinson: It says what it says.
Mr. Arshinkoff: You want her indicted, get her indicted.
Mr. Pry: That may be where it goes next.
Mr. Hutchinson: Yeah, give it a try.

The challenger then refused to provide further testimony and invoked the Fifth Amendment to the U.S. Constitution, fearing that she may be indicted for election falsification. (*Id.* at 7:15-13.)

The foregoing example is not an isolated one. Another challenger lodged some 200 challenges based on the fact that mail was returned as undelivered, even where he did not know any of the challenged voters, never visited their residences, and never saw one piece of unreturned mail. (*Id.* at 38:16-40:17.) These challenges were dismissed with prejudice for want of proof. (*Id.* at 63:9-10.) Members of the Summit County Board of Elections were "appalled," described these challenges as an "absolute travesty," and considered them an "attack[] [on] the fundamental right of people's right to vote." (*Id.* at 31:13-23.)⁶

B. Disparate Impact

The evidence shows that many more newly registered mailings was returned from precincts that were predominantly minority than from predominately White precincts. This is presumably because people who live in the inner city are more likely to be transient and change their addresses than those who live in

⁶ One of the Board Members advised that he planned to request the Summit County Prosecutor to investigate whether the challengers should be prosecuted for election falsification. (*Id.* at 66:22-67:3.)

predominately White suburbs. Whatever the reason, Intervenor's expert Philip Klinkner demonstrates the disparate impact. (*See also* Ex.12, Lott Analysis.)

Professor Klinkner obtained the challenge lists for Cuyahoga County and Hamilton County. Cuyahoga County is the largest in Ohio – it is where the City of Cleveland is located. Cincinnati is located in Hamilton County. He was able to obtain data showing the voting precinct in which each challenged voter lived. He also obtained data showing the racial breakdown of the voting age population in each voting precinct in both counties. (Klinkner Dec. ¶ 3.)

Then Professor Klinkner examined whether there was a correlation between the number of challenged voters in a precinct and the racial make up of the precinct. He found:

“a strong and statistically significant relationship between the number of challenged voters and the race of the precincts in which they were challenged. In other words, it is substantially more likely that challenges will occur in precincts that are more heavily black. . . .”

(*Id.* ¶ 2.)

For example, in Cuyahoga County voters in the most heavily black precincts (90%-100%) are nearly three times as likely to be challenged compared to voters in the most heavily non-black precincts (0-10%). (*Id.* ¶ 2.) In Hamilton County, voters in the most heavily black precincts are nearly eight times as likely to be challenged compared to voters in the most heavily non-black precincts. (*Id.* ¶ 4.)

Professor Klinkner's results do not change in a material way when he uses the econometric techniques that Defendant RNC's expert argued in his deposition that Professor Klinkner should have used. (*Id.* ¶¶3, 5.) Professor Klinkner's conclusions are set forth in (hopefully) lucid form in his declaration, and they establish that the challenges from the list at issue in this case will have a racially disproportional impact.

The RNC's analysis of the returned mailings was done based on mailings by the RNC and by the Ohio RP. (*See supra.*) The RNC seems to take the position, however, that if it relied on the State Board of Election's mailings it could escape the reach of the Consent Decrees. Thus, the RNC says: "In view of . . . the fact that the names being challenged were drawn overwhelmingly from County mailings that were returned as undeliverable – rather than RNC mailings – the Republican Party of Ohio initiated statutory challenges to voter registrations." (*See* Def. Opp. Memo to Proposed Intervenor's Emergency Mot. to Intervene at 5.) But the racially discriminatory *impact* of these challenges does not depend at all on whose mailings the list was based on. And the RNC had already sorted by zip codes the letters, returned as undeliverable, that had been sent by it and the Ohio RP. The RNC had sent people to take photos of the addresses. (*See* Cino Dep. Tr. at 87:7-13, 88:21-22.) The RNC knew where the returned mail had come from and undoubtedly knew that the challenges would fall disproportionately on inner city minorities before it decided to challenge based on the County Election Board returned mailings.

In any event, both Section 2 of the Voting Rights Act of 1965 and the Consent Decrees entered in this case focus on *effect* not purpose. *See e.g. Ortiz v. City of Philadelphia Office of City Commissioner*, 28 F.3d 306, 309 (3d Cir. 1994) ("Congress made clear that a violation of § 2 could be established by proof of discriminatory result alone.")

Similarly, this Court's Consent decree focuses on "purpose *or significant effect*". (*See* 1982 Settlement Agreement at Section 2(e).) And the same section of the Settlement Agreement states:

the *conduct of such activities disproportionately in or directed towards districts have a substantial proportion of racial or ethnic of populations shall be considered relevant evidence of the existence of such a factor and purpose.*

(*Id.*)

The 35,000 challenges program will fall disproportionately on African-American precincts and on African Americans. The RNC undoubtedly knew this before the challenges efforts were conducted. Their sorting by zip codes and subsequent investigations would make this clear. These challenge efforts were aimed at “vote fraud” and constitute a “Ballot Security” effort under the definition in paragraph A of the 1987 Consent Decree. It therefore required prior approval of this Court under paragraph C of that Decree. It may be enjoined for that reason alone. Moreover, it would not qualify for approval because the voter challenge effort has a clear and known discriminatory impact.

III. THE 35,000 VOTER CHALLENGE PROGRAM WILL LIKELY CAUSE LONG DELAYS AT THE POLLS AND INTIMIDATE VOTERS

The eleventh hour pre-election challenges to the 35,000 newly registered voters on October 22, 2004, overwhelmed the County Boards of Elections. They were required under state law to give notice to each challenged voter, and hold a hearing *before the election* and adjudicate the voter’s right to vote. This not only placed a huge burden on the challenged voters’ right to vote. It also proved impossible. A federal court has entered a restraining order effectively ending these pre-election challenges. All this has been reported in the past and is a matter of public record.

However, a Republican Party spokesperson has said that they will now simply make their challenges to the voters on the 35,000 person list at the polls on Election Day. *See* Ex. 14, Jo Becker, *Judge Rebuffs GOP Effort to Contest Voters in Ohio*, Washington Post (Oct. 28, 2004). This will impose an unacceptable burden on the election process, and risk intimidating and disenfranchising voters, particularly in predominately minority precincts.

First, this has been conceded by the Secretary of State of Ohio. The Secretary of State issued a statement on October 29, 2004 regarding challengers at Ohio's polling places. He stated that "[a]s Secretary of State it is my responsibility to conduct Ohio's elections in a manner as open and accessible as possible." (*See* Ex. 15, Declaration of Timothy Burke ("Burke Dec."), Chair of the Hamilton County Board of Elections, at ¶¶ 36, 37.) The Secretary of State then "instructed the Attorney General to offer the following recommendation to the federal courts in Hamilton and Summit counties for resolution of these matters now: All challengers of all parties shall be excluded from polling places throughout the State." (*Id.*) The Attorney General has rejected the proposal, and massive election day challenges may therefore still be made. (*Id.* ¶ 38.)

A challenge to a voter on election date by a partisan pollwatcher can be made on six different grounds, one of which is that the voter does not live in the precinct. (Burke Dec. ¶¶ 1, 10.) The challenger need not provide evidence in support of the challenge. He need only designate the statutory ground -- e.g., "lack of residency in the precinct." (Burke Dec. ¶ 11.)

Once made, the challenge automatically triggers a process that imposes burdens on the challenged voter and the "presiding judge," one of the four poll *workers* whose main job is to help move voters through the voting process. (Burke Dec. ¶ 12.)

Thus, the presiding judge must administer an oath to the challenged voter and ask her three specified questions directed to her right to vote. (Burke Dec. ¶¶ 15-16.) And the voter must sign the oath, which contains the statement "WHOEVER COMMITS ELECTION FALSIFICATION IS GUILTY OF A FELONY OF THE FIFTH DEGREE." (Burke Dec. ¶ 52.)

If the voter declines to sign the oath or answer questions, then *all* of the poll workers must meet and decide by majority vote whether the voter may vote. (Burke

Dec. ¶ 18.) If the poll workers decide the voter is not entitled to vote, a provisional ballot will be provided and filled out. However, under state law it is unlikely to be counted. (Burke Dec. ¶¶ 19-20.)

If the challenged voter answers the questions correctly and clearly fills out the oath, the presiding judge acting alone may permit the voter to vote. (Burke Dec. ¶ 16.) Hamilton County and other counties have decided that the presiding judge *will* permit the voter to vote a regular ballot under those circumstances. (Burke Dec. ¶¶ 29-31.) However, state law and the Secretary of State's guidance provide that additional questions may be asked by the presiding judge; and the voter may be deemed "ineligible" "if for any other reason a majority of the judges (the other poll workers) believes the person is not entitled to vote." (Burke Dec. ¶¶ 33-35.)

Mr. Burke states the following about the effect of election day challenges on the election process:

41. I am not confident that myself or my fellow board members, or the election judges, are prepared to deal with the high number of challengers we are expecting.
42. Traditionally, in Hamilton County, parties have named their precinct executives (who are also known as central committee members) as challengers, but to my memory neither of the parties have ever used challengers in the polling places to challenge voters.
43. Moreover, during the course of the trainings, our election judges were asked whether any of them have ever experienced challengers making challenges in their polling places. The near unanimous response has been "no." For the overwhelming majority of our poll workers, even those who have worked at polling places for more than 30 years, this election would mark the first time they have ever encountered a challenger making challenges in a polling place.

44. It is therefore my belief that none of our presiding judges have ever had to administer a 10-U form in the past, or facilitate the resolution of challenges by challengers. Likewise, none of our non-presiding judges have ever participated in the resolution of challenges by challengers before.
45. Despite the training we are providing, I am very concerned that our election judges will be confused by the challenge process, that their time and attention will be consumed by processing challenges, and that the filing of challenges will disrupt voting on election day.
46. When a challenge is made, the attention of the presiding judge must be devoted to the challenge instead of to the processing of voters. In the event that a challenged voter's answers to the 10-U questions produce uncertainty about their eligibility to vote, or in the event that a challenged voter does not sign the 10-U oath, all four election judges (i.e., all the poll workers) may also have to get involved in processing the challenge. This would effectively shut down the processing of voters until the challenge is resolved.
47. Repeated challenges made at a polling place will accordingly have the effect of slowing down the processing of all voters, even those who are not themselves challenged.
48. This slowing down of the process will lead to long lines at the polling place, lines that will discourage many voters from voting.

Mr. Burke states the following about the effect of election day challenges on minority voters:

49. The challenge process is also likely to intimidate voters – both those who are themselves challenged (whether or not they are eligible to vote) and voters who are not challenged.

50. Most voters will have heard news reports that hundreds of challengers will be in polling places to combat "voter fraud." The claims of voter fraud have often been associated with people who have moved since they registered to vote. This, in and of itself, may discourage some eligible voters from turning out on election day, particularly voters who have moved since they registered and yet remain fully eligible to vote.
51. Those voters who do come to the polls will observe challengers questioning the eligibility of other voters ahead of them in line, often on the ground that they are not a resident of that precinct. This may discourage many voters from voting, particularly new voters who may not know for sure in which election precinct they live.
52. Moreover, voters who are challenged will be required to have an oath administered to them and they must sign a form which states in bold letters **"WHOEVER COMMITS ELECTION FALSIFICATION IS GUILTY OF A FELONY OF THE FIFTH DEGREE."** I have no doubt that this form will discourage eligible voters from voting.

* * * * *

53. I believe that low-income and minority voters are most likely to be dissuaded from voting as a result of these challengers.
54. First, I have examined the challenger designations filed by the Republican Party, and it is clear that Republican challengers will be concentrated in highly African American precincts. For the reasons stated above, the presence of these challengers on election day will likely have the effect of reducing the number of African American voters in this election.
55. Moreover, my experience tells me that the African-American community is most likely to be intimidated by a combination of the claims of voter fraud and the presence

of challengers at the polls because, if challenged, they may very well feel that they themselves are being accused of voter fraud.

56. In these communities, where residents are more likely to have had negative encounters with the law and law enforcement, the prospect of having to effectively run a gauntlet of challengers – challengers sent to combat “fraud” – will have the effect of discouraging African Americans from voting.
57. Likewise, the prospect of having to sign a form that warns in bold letters of a **“FELONY OF THE FIFTH DEGREE”** is likely to scare voters – even those fully eligible to vote - and dissuade them from voting.
58. I am also extremely concerned about challenges based on residency because of the nature of the questions contained in Form 10-U and the potential for misunderstanding by either the presiding judge or the prospective voter. For example, question (c)(3) on the 10-U form asks “When you came into this precinct, did you come for a temporary purpose merely or for the purpose of making it your home?”
59. The United States Sixth Circuit Court of Appeals has already clearly ruled that a college student is entitled to register and vote where they are going to college even though any parent sending a child to college certainly hopes that the stay at college is “for a temporary purpose.” Thus, voters may be eligible to vote even if they think they are living in a precinct temporarily.
60. I believe that the language of this question has a great potential to be misunderstood and misapplied everywhere, but particularly in low-income communities with lower levels of educational achievement and where residents are likely to be tenants rather than homeowners and move more frequently.

Intervenors respectfully submit that the RNC's conduct violates the consent decree. And they further submit that the use of a list of 35,000 newly registered voters to make massive challenges on election day, which challenges clearly lack a proper factual basis, imposes an unacceptable risk and an unacceptable burden on the right to vote of all who live in Districts where the challenges will be focused.

IV. THE CONSENT DECREE HAS BEEN VIOLATED AND THE COURT SHOULD ORDER THE RNC AND OHIO RP POLL WATCHERS NOT TO USE THE LISTS TO CHALLENGE ON ELECTION DAY

The RNC has agreed that it “shall not engage in, and shall not assist or participate in, any ballot security program unless the program (including the method and timing of any challenges resulting from the program) has been determined by this court to comply with the provisions of the Consent Order and applicable law.” (Ex. 16, Final Consent Decree at 2). The Decree defines “ballot security” efforts to include any “efforts to prevent or remedy vote fraud.” (*Id.*) This agreement was memorialized on July 27, 1987. (*Id.*) The Final Consent Decree was an amendment to this Court's original Consent Order, which was entered on November 1, 1982. (Ex. 17, 1982 Consent Order.)

The 1982 Consent Order specifically binds the RNC and its “agents, servants and employees.” (*Id.* at ¶ 4.) And the Final Consent Order permits the RNC to “deploy persons on election day to perform normal poll watcher functions,” but only “so long as such persons do not use the results of any other ballot security effort, unless the other ballot security effort complies with the provisions of the Consent Order and applicable law and has been so determined by this Court.” (Ex. 16, Final Consent Decree at 2.)

The Final Consent Decree defines “ballot security” efforts to include “ballot security or other efforts to prevent or remedy vote fraud.” (*Id.*) The evidence

shows that the RNC has engaged in, assisted in and participated in a ballot security program that has not been determined by this Court to comply with the First Consent Order, and that does not in fact comply with that order because of its discriminatory impact. The evidence also shows the RNC and the Ohio Republican Party intend to deploy poll watchers as their agents, armed with the results of this unapproved ballot security program.

A. The Poll Watchers are Agents

An agency relationship exists “when one party exercises the right of control over the action of another, and those actions are directed towards the attainment of an objective which the former seeks.” *Gen. Acquisition, Inc. v. GenCorp, Inc.*, 766 F. Supp. 1460, 1469 (S.D. Ohio 1990) (applying Ohio law); *Bulletin Broadfaxing Network, Inc. v. Times Mirror Co.*, 1992 U.S. Dist. LEXIS 6399 at *24 (D.D.C. May 13, 1992) (applying District of Columbia Law) (“the agent takes action on behalf of the principal and subjects himself to the orders of the principal.”). A principal need not exercise direct control over the agent; rather, “it suffices that such a right exists.” *Gen. Acquisition, Inc.*, 766 F. Supp. at 1469. This right of control “need not extend to every aspect” of the relationship between the principal and the agent. *Gen. Acquisition, Inc.*, 766 F. Supp. at 1469. The RNC and the Ohio RP clearly possess the authority to control and direct the acts of the poll watchers they have trained and reunited. *See Heitmanis v. Austin*, 677 F. Supp. 1347, 1358 (E.D. Mich. 1988) (“It is well established that the rules and policies of a national political party take precedence over contrary state political party rules.”) (citing *Democratic Party of the United States v. Wisconsin*, 450 U.S. 107 (1981)).

The evidence shows that the distinction between the RNC and the Ohio Republican party is tenuous at best. The RNC’s governing body is a Committee made up of the Chairman of, and two other representatives of, each State

Republican Party. (Cino Dep. at 12.) The RNC provides funding to the state parties. (*Id.* at 19:12-20:3). It trains state party personnel. (*Id.* at 17; 32:16-22). The RNC helps the state party develop communication and public relations plans and strategies. (*Id.* at 20:15-21:4.) They have a joint mission -- to get Republican candidates elected, and the relationships are especially close in a Presidential election year with national candidates on the ballot.

The RNC is heavily involved in pollwatcher activities. The RNC issues guidelines and manuals to the state party on poll watching activities. (Cino Dep. at 34:14-35:4;) (Ex. 18, at RNC 00012-32.) The RNC's poll watcher instructions include instructions on "(c)hallenging voters on Election Day." (Ex. 19, at RNC 000135.) They also include specific questions to be asked of voters at the polls. (*Id.* at RNC 000144.)

The RNC also organized and participated in conference calls with the Ohio RP outlining state poll-watching plans and anticipated election day problems. (Ex. 20, at RNC 000174.) Part of the agenda for one of these calls "with national" (referred in email traffic as the "HAVA Election Preparation Call #2," which was scheduled to occur this past Wednesday) includes confirming the number of pollwatchers. (Ex. 21 at RNC 000131-134.) Here, the RNC participated in mass mailings and analyzing the voter fraud potential in the undelivered mail. (Cino Dep. at 75:17-76:3.)

This evidence shows that in efforts to challenge newly registered voters whose mail is returned as undelivered the RNC and the Ohio RP acted jointly, and the poll watchers are agents of both.

Moreover, the RNC and the Ohio Republican Committee have repeatedly held themselves out to be one and the same. For example, the RNC sent letters to newly registered voters of Cuyahoga County in envelopes bearing the return address of the Ohio Republican Party. (Cino Dep. Tr. at 76:17-22). The RNC also

announced on television that “*We’re* going to have poll watchers in areas where we believe that Democrats may try to steal the election.” (Ex. 22, Shapiro Perl Dec.)⁷

To enforce the Consent Decree, Intervenors ask that the Court find that the Decree has been violated by the RNC, and order the RNC to send an immediate written message to its poll watchers in Ohio not to make any election challenges based on the list at issue in this case.

B. The Ohio Republican Party is Acting in Concert with the Republican National Committee to Violate the Consent Decree

Injunctions and consent decrees issued by this Court are binding upon and can be enforced against “the parties to the action, their officers, agents, servants, employees, and attorneys, and upon those person in active concert or participation with them who received actual notice of the order by personal service or otherwise.” Fed. R. Civ. Pro. R. 65(d). In enforcing its consent decree, the Court “may hold in contempt those who act in concert with named parties to frustrate an injunctive decree or to avoid compliance with it.” *EEOC v. Int’l Longshoremen’s Assoc.*, 541 F.2d 1062, 1064 (4th Cir. 1976).

Parties bound by a consent decree violate that decree when they utilize third-party surrogates to evade the confines of the decree. *Regal Knitwear Co. v. NLRB*, 324 U.S. 9, 14 (1945) (“[D]efendants may not nullify a decree by carrying out prohibited acts through aiders and abettors, although they were not parties to the original proceeding.”); *United States v. Schine*, 260 F.2d 552, 553 (2d Cir. 1958) (finding violation of consent decree by party who admitted that it could not engage

⁷ A tape of this conversation is being provided to counsel for the RNC and will be available in court Monday.

proscribed activity, but argued that “independent corporations” it owned were not prevented from engaging in that same activity.).

Moreover, third parties who were not parties to the original action from which a consent decree was issued can still be held to have violated that decree and be subject to orders enforcing it. *See Northwest Women’s Center, Inc. v. McMonagle*, 868 F.2d 1342, 1355-56 (3d Cir. 1989) (third parties who trespassed upon health-clinic could be enjoined from acting under prior injunction issued against trespassing defendants with whom they acted in concert); *Kansas City Royals Baseball Corp. v. Major League Baseball Players Assoc.*, 532 F.2d 615, 632 (8th Cir. 1976) (National and American Baseball Leagues, unincorporated associations comprised of individual baseball clubs, could be enjoined by a consent decree issued in an action against an individual club). Therefore, the poll watchers and the Ohio RP can be enjoined from violating the consent decree even though they were not parties to the original action. In extending its injunction against the University of Alabama which prohibited the university from denying an African-American student the right to enroll, the Northern District of Alabama held that Governor George Wallace, a non-party to the injunction, could not obstruct the operation of the injunction. *United States v. Wallace*, 218 F. Supp. 290, 291 (N.D. Ala. 1963). “Thoughtful people, if they can free themselves from tensions produced by established principles with which they violently disagree, must concede that the governor of a sovereign state has no authority to obstruct or prevent the execution of the lawful orders of a court of the United States.” *Id.* The Republican Party of Ohio, likewise, has no authority to obstruct this Court’s order.

V. STANDARDS FOR ISSUANCE OF A PRELIMINARY INJUNCTION

Intervenor is entitled to a preliminary injunction if she establishes: “(1) a reasonable probability of success on the merits; (2) that irreparable injury will result if the motion is denied; (3) that granting preliminary relief will not result in even greater harm to the nonmoving party; and (4) that granting preliminary relief will be in the public interest.” *Telco Communications, Inc. v. Barry*, 731 F. Supp. 670 (D. N.J. 1990) (citing *Ecri v. McGraw-Hill, Inc.*, 809 F.2d 223, 226 (3d Cir. 1987)).

A. Intervenor’s Likely to Succeed on the Merits

To satisfy the preliminary injunction standard “it is not necessary that the moving party’s right to a final decision after trial be wholly without doubt; rather, the burden is on the party seeking relief to make a prima facie case showing a reasonable probability that it will prevail on the merits.” *Oburn v. Shapp*, 521 F.2d 142, 148 (3d Cir. 1975). Intervenor is likely to succeed on the merits.

First, the RNC participated with the Ohio Republican Party in voter fraud strategy, and the efforts to develop a list of returned mailings to challenge newly registered voters. Second, that list disproportionately targeted and impacted African American voters. And third, the consequences flowing from mass challenges on election day could be catastrophic.

B. Irreparable Injury

In cases such as this, where it is alleged that Intervenor’s constitutional rights are being violated, courts generally have presumed irreparable injury. *See, e.g.*, 11 C. Wright and A. Miller, *Federal Practice and Procedure: Civil* §2948 at 440 (1973 ed.); *Ellrod v. Burns*, 427 U.S. 347, 373 (1976) (“loss of First Amendment freedoms, even for minimal periods of time, unquestionably constitutes irreparable injury”). This principle has been applied repeatedly to the right to vote. *See, e.g.*,

United States v. Berks County, 250 F. Supp. 2d 525, 540 (E.D. Pa. 2003) (harm is irreparable because “voters denies equal access to the electoral process cannot collect money damages after trial for the denial of the right to vote.”) *Charles H. Wesley Educ. Found. v. Cox*, 324 F. Supp. 2d 1358, 1368 (N.D. Ga. 2004) (“[No monetary reward can remedy the fact that [plaintiff] will not be permitted to vote in the precinct of her new residence”); *Dillard v. Greensboro*, 870 F. Supp. 1031, 1035 (M.D. Ala. 1994) (“The injury alleged by the Plaintiffs is denial of the right to participate effectively in the political process Given the fundamental nature of the right to vote, monetary remedies would be inadequate compensation for the Plaintiffs”).

It is clear that Intervenor and others similarly situated are at risk of being prevented from voting on election day because of the delays and chaos that will ensue if the RNC is permitted to challenge the individuals on the List.

C. Relative Harm to the Parties

It is also clear that the fundamental right to vote cannot be outweighed by hypothetical instances of fraud that may occur as the RNC is likely to insist. Indeed, the Sixth Circuit upheld an Ohio district court’s grant of a temporary restraining order putting a halt to pre-election day challenges “After considering the difficulties posed by competing concerns of not discouraging or preventing legal voting, on the one hand, and minimizing false registrations and election fraud, on the other hand.” *Miller v. Blackwell*, Nos. 04-4299/4300/4301 (Oct. 29, 2004) (*See* Ex. 23.) Thus, as more fully explained below, the RNC should be found in violation of the Consent Decree and preliminarily injunction should issue to prevent any challenges from taking place based on the List.

The RNC urges this Court that its efforts are designed to prevent voter fraud. However, the RNC has not provided any evidence that this fraud is anything more

than conjecture. And even if it could it would be of no moment, as the Sixth Circuit just upheld a temporary restraining order “[a]fter considering the difficulties posed by competing concerns of not discouraging or preventing legal voting, on the one hand, and minimizing false registrations and election fraud, on the other hand.” *Miller v. Blackwell*, Nos. 04-4299/4300/4301 (Oct. 29, 2004) (*See* Ex. 23.) In any event, there are sufficient official state poll worker staff who are trained to detect fraud and no evidence has been presented that these officials will do anything other than what is required by state law.

The potential harm a preliminary injunction portends for the RNC appears to be that it “distract[s] the [RNC] with litigation and...prevent[s] it from engaging in routine election activity.” (Def. Opp. to Mot. to Intervene at 1). Requiring the RNC to adjust their election strategy and not use the impermissible ballot security lists causes only a minimal administrative burden, which is outweighed by intervenor’s right to vote. *See United States v. Berks County*, 250 F. Supp. 2d at 541 (administrative expenses incurred by defendants “are far outweighed by the fundamental rights at issue.”)

D. The Public Interest

The public interest would clearly be served by an injunction that would prohibit the Republican National Committee from employing these methods of voter intimidation and disenfranchisement through their “ballot security program. The public—both in Ohio and the nation as a whole—has a vested interest in ensuring that the catastrophic mistakes of the 2000 presidential election are not repeated. The public interest is served by issuance of a preliminary injunction when that order will ensure “that all citizens may participate equally in the electoral process serves the public interest by reinforcing the core principles of our democracy.” *United States v. Berks County*, 250 F. Supp. 2d at 541.

Moreover, the public interest is not served by allowing the RNC to so blatantly resurrect prohibited practices in violation of this Court's order and renders the Consent Decree to which they are bound meaningless.

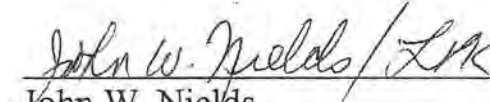
CONCLUSION

For the foregoing reasons, Intervenor request that the Court:

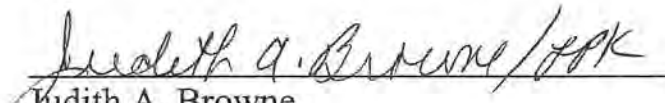
- (a) Find that the RNC has, to a high probability, violated the Consent Decree;
- (b) Preliminarily enjoin the RNC to issue immediate written instructions to poll watchers in Ohio that the Court has forbidden use of the returned mail lists to make challenges on election day;
- (c) Grant such other relief as this Court deems appropriate.

* * *

Respectfully submitted,


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Dated: October 31, 2004

Counsel for Intervenor

CERTIFICATE OF SERVICE

I hereby certify that, on this 31th day of October, 2004, true copies of the foregoing Memorandum in Support of Intervenor's Motion for a Preliminary Injunction were served by hand upon each of the parties listed below:

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Genova Burns & Vernoia
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354 Eisenhower Parkway
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Attorney for Intervenor

Exhibit 1

United States District Court
District of New Jersey

Democratic National Committee, *et al.*,
Plaintiffs,

v.

Republican National Committee, *et al.*,
Defendants.

Civil Action No. 81-3876

Judge Dickinson R. Debevoise

DECLARATION OF MARIA CINO

1. My name is Maria Cino. I am the Deputy Chairman of the Republican National Committee, 310 First Street, SE, Washington, DC. 20003. I have held this position since June 2003.

2. Since receiving the Democratic National Committee's papers at approximately 7 pm EDT on Wednesday, October 27, 2004, my staff and I have investigated the facts and circumstances upon which the DNC's allegations are purportedly based. This Declaration is based upon facts within my personal knowledge and facts ascertained as a result of our ongoing investigation

3. On June 15, 2004, RNC Chairman Ed Gillespie wrote to DNC Chairman Terry McAuliffe proposing that the RNC and DNC jointly attempt to assure that all properly registered voters be allowed to vote without improper interference or intimidation. In particular, Chairman Gillespie proposed that each party list all precincts throughout the country in which it anticipated problems, and then endeavor to have both a Republican and Democratic volunteer working cooperatively as an observation team in each of those precincts. The intent of this proposal was to avoid election-eve charges by the Democratic Party of voter intimidation, and by the

Republican Party of vote fraud. (A copy of the June 15, 2004 letter is attached hereto as Exhibit 1). Although Chairman McAuliffe responded by letter of July 1, 2004 (attached hereto as Exhibit 2), he did not accept the proposal of cooperative observation teams.

4. On or about August 10, 2004, the Republican National Committee mailed a letter welcoming all newly-registered voters in Cuyahoga County, Ohio, to the political process, and encouraging them to support the Republican ticket. Because the RNC wanted to welcome all newly-registered voter to the political process, the mailing went to all newly-registered voters in Cuyahoga County. A copy of this letter, which clearly indicates that it was "Paid for by the Republican National Committee," is attached hereto as Exhibit 3. The RNC selected Cuyahoga County for this mailing because it understood that the county had a particularly large number of new registrants. Of the 49,552 letters mailed, approximately 3,353 were returned as undeliverable. These returned mailings have not been used in any challenges to voter registrations. Neither Ebony Malone nor Irving Agosto were on the mailing list for this letter.

5. On September 9, 2004, the Republican Party of Ohio sent letters to newly-registered voters in 5 Ohio Counties: Cuyahoga, Franklin, Summit, Hamilton, and Montgomery. These counties were selected because they were the counties with the largest anticipated numerical increases in registration. All Ohio counties were not selected simply because of the expense of obtaining all the lists, the expense of mailings, and the declining benefit of outreach efforts to new voters in counties that had minimal new registrations. Again, these letters went to all newly registered voters. A copy of this letter, which clearly indicates it was "Paid for by the Ohio Republican Party," is attached hereto as Exhibit 4. 15,238 of these letters were returned as undeliverable. Again, neither Ebony Malone nor Irving Agosto were on the mailing list to receive this letter.

6. It is the practice in Ohio for county Boards of Elections to send informational packets to newly-registered voters, informing new registrants of the location of their polling stations and other important information. These mailings were sent at various times during 2004. Neither the RNC nor the Republican Party of Ohio had anything to do with these mailings.

7. Beginning on or about October 7, the Republican Party of Ohio began to receive reports that, by the week of October 18, demonstrated that tens of thousands of letters sent by the county Boards of Election had been returned as undeliverable. This fact was reported in the Ohio press, and became a matter of interest to the public and to the Republican Party. Exemplary articles reporting on these returned mailings are attached as Exhibit 5. Although Intervenors Ebony Malone and Irving Agosto were not on either the RNC mailing list or the Republican Party of Ohio mailing list, they were on the county Board of Elections mailing list, and any challenge to their multiple registrations arises from the fact that the county mailings to them were returned as undeliverable.

8. Concurrently over the last couple of months, there have been widespread media reports of voter registration irregularities in Ohio and throughout the country. For example, in Ohio, media reports indicated that:

a. A woman working for a group aligned with the Democratic Party paid for the voter registration of fictitious persons with crack cocaine. An exemplary media report of this incident is attached as Exhibit 6.

b. An individual in Columbus, Ohio was indicted on two felony counts for submitting a false election registration form and submitting a false signature. An exemplary media report of this incident is attached as Exhibit 7.

c. Officials in Hamilton County, Ohio are currently investigating possibly fraudulent voter registration cards. An exemplary media report of this incident is attached as Exhibit 8.

9. The group known as Association of Community Organizations for Reform Now ("ACORN"), to which both Intervenors refer as soliciting their involvement in this lawsuit, has been widely implicated by media reports in fraudulent voter registration activities in Ohio and other states. Among the potentially illegal activities are the submission of fraudulent signatures and payment on a per-registration basis for gathering voter registrations. ACORN is currently under criminal investigation in Colorado, Florida, North Carolina, and Ohio. Media reports of ACORN's voter registration activities in Ohio, by way of example, are attached as Exhibit 9.

10. Rather than allow Democrat-aligned groups to continue engaging in such blatant voter registration improprieties, I understand that the Republican Party of Ohio initiated challenges to the questionable voter registrations. It appears that these challenges were based primarily on the county Board of Elections Mailings, and were not based on the RNC's mailing. These challenges are being pursued through the statutory process in Ohio, which provides each challenged registrant an opportunity for a hearing. It is my understanding that yesterday, a federal district judge enjoined the challenge process, although it has also been reported that the Attorney General of Ohio has filed an emergency appeal to the Sixth Circuit.

11. Neither the RNC, nor to the best of my knowledge, information, and belief, the Republican Party of Ohio, has been involved in any efforts to suppress voter turnout, and certainly not in any racially motivated or directed efforts to remove qualified voters from the voter rolls. The RNC firmly believes that every qualified and properly registered voter should make every effort to vote, and should be allowed to do so. But there is no place in a fair and

open election process for fraudulent voter registration, whether of fictitious persons like Mary Poppins or Dick Tracy, or of unqualified persons, or of persons who, like the Intervenor here, register multiple times at multiple addresses.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Maria Cino

Exhibit 1



Republican National Committee

Ed Gillespie
Chairman

June 15, 2004

Chairman Terry McAuliffe
Democratic National Committee
430 South Capitol Street, SE
Washington, DC 20003

Dear ~~Chairman McAuliffe~~:

As we cast our votes this November, I know you agree that no American should believe that he or she will be intimidated from voting or that his or her vote won't count because of fraud. As both you and I have noted, there is a problem with American elections if the process is not perceived as fair.

The challenges of properly implementing the new Help America Vote Act (HAVA) gives us a unique opportunity to try to correct some of the systemic problems our process faces. I'd like to propose a program under which we can work together as the chairs of our respective Parties to protect the integrity of the voting process for every American.

You have falsely and unfairly charged the Republican Party with trying to intimidate voters. The Republican National Committee is not, and will not be, engaged in any effort to suppress or intimidate voters. Our Party finds such conduct reprehensible and if we receive any evidence that such conduct is occurring, I will take all steps necessary to ensure that it ceases immediately. Rather, our goal in this election is an unprecedented effort to register new voters and encourage participation in the political process.

The other side of the coin is that, just as Democrats apparently believe that Republicans are engaged in voter intimidation, many in my Party believe Democrats engineer voter fraud. I know you feel about these charges the way I feel about the charges of voter intimidation.

The unfortunate reality – and why I am writing you today – is that these charges and counter-charges reflect two sides of a coin that create an atmosphere of divisiveness across our country. As Chairs of the parties, I know you feel as I do that we have an obligation to make this situation better.



What I hope we can do is join together for a program to bring transparency and openness to every voting place in the country where either of us believes there is a potential for voter intimidation, fraud or mistrust of the tabulation process. The proposal, which I look forward to discussing and refining further with you, is an unprecedented and massive undertaking – but worth it.

Each of us would list every precinct where we fear there could be a problem on Election Day. To put some limits on it, we could begin with Presidential battleground states, as well as those with contested Senatorial and Gubernatorial races.

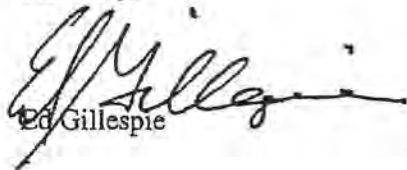
Next, each of us would be responsible for recruiting a volunteer for each named precinct. The Republican and Democratic volunteers would work as an observation team.

We would recruit similarly bipartisan teams assigned to cover multiple precincts to respond to and investigate reports of problems. The teams would agree on avenues of appeals that could be taken to the courts, if needed.

We would invite members of the media to be present either in a central location or embedded with the teams.

The goal is to provide a mechanism where the problems that have occurred in the past with voting, and will face a major test this election with the implementation of HAVA, have a transparent, bipartisan solution.

Sincerely,



Ed Gillespie

Exhibit 2



DEMOCRATIC NATIONAL COMMITTEE

July 1, 2004

Chairman Ed Gillespie
Republican National Committee
310 First Street, SE
Washington, DC 20003

Dear Chairman Gillespie:

The Democratic National Committee (DNC) and the Voting Rights Institute applaud your commitment to openness and fairness in the electoral process for 2004 and beyond; the citizens of this country deserve nothing less. We also agree that eligible voters should be able to exercise their right to vote without fear of harassment or intimidation, and we strongly oppose any fraudulent behavior or activity at polling places.

As you know, Congress passed the Help America Vote Act (HAVA) in response to the tremendous voting irregularities that occurred in 2000 – most memorably in Florida. Its goal is to help ensure the very openness and fairness that we all agree is fundamental to the credibility of the electoral process. This is to be done, in part, by allocating funds to states to improve their election systems and by establishing uniform standards that should be employed by those systems, to ensure that money is being spent wisely and effectively.

Deforest "Buster" Soaries, Jr., Chair of the bi-partisan Election Assistance Commission (EAC) that has been charged with the immense task of implementing HAVA, has said that the Commission lacks the funding to ensure that these standards – which are so crucial to the success of bringing more openness to our electoral process – are developed and implemented. Further undermining the EAC's efforts is the fact that President Bush has requested a \$10 million budget cut for this fiscally strapped Commission in FY2005, under the unsupportable assumption that there will somehow be unobligated balances in this amount carried over from FY2004. We ask therefore, that you and the RNC join us in calling on Congress to appropriate the funds needed to fulfill the promise of HAVA.

Funding alone, of course, is not the solution to the problems so many voters have faced in attempting to vote. Systemic changes that address these issues should be encouraged and supported. The League of Women Voters, the Leadership Conference on Civil Rights and other leading civil rights organizations, have identified the top five risks to eligible voters in 2004: voter registration problems, erroneous purging, problems with the new ID requirement, difficulties with the new electronic voting systems and failure to count provisional ballots.

To deal with some of the problems facing voters this fall, the League of Women Voters have recommended the following steps be implemented to ensure that no eligible

citizen is disenfranchised. We agree with many of their conclusions and would encourage the RNC to support the implementation of these procedures:

1. Ensure that voter registration applications or forms are processed in a timely fashion prior to Election Day. State and local election officials should be encouraged to update their voter registration lists and to maintain open lines of communication between polling sites and the registrar's central office.
2. Provide timely notice to any citizen who has been purged from a state felon list so he or she may register to vote prior to Election Day if they are eligible. The list should be made public to ensure that these citizens are notified prior to the statewide deadline for voter registration. We also encourage state and local officials to cut off or stop any purging after August 1, 2004.
3. Every citizen should be educated on what form, if any, of ID they may be required to produce at their polling place and this information should be widely published prior to Election Day.
4. Educate citizens on the new voting systems that will be used in their local jurisdiction this fall. We also encourage that security standards be set to maintain the integrity of our voting systems.
5. Every polling site in America should have provisional ballots available to citizens who may show up at the wrong site. We also encourage a non-discriminatory process for issuing and counting these provisional ballots.

We believe it is necessary to remove every barrier that impedes or denies an eligible vote. The RNC and its allies should work with its state parties and affiliates to encourage campaign and election workers to help protect and promote the rights of all citizens to have a voice in their democracy. And the Republican Party should stand firmly and publicly against any group, whether or not affiliated, that devises schemes to impede lawful registration and access to the polls.

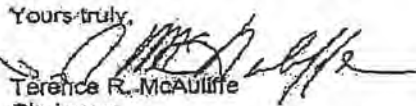
We are also calling on the RNC to urge the Department of Justice to follow up on existing voting rights violation cases that have not been adequately addressed. The Justice Department has been given the task of implementing some important HAVA provisions. We encourage the Department to not only vigorously enforce the Voting Rights Act, as amended, but to safeguard the electoral process by working with state and local officials to ensure no one is harassed or intimidated while attempting to participate in the electoral process.

Forty years ago this summer, activists from across America converged in Mississippi to help educate and register tens of thousands of previously disenfranchised American citizens. In the spirit of their leadership and determination to expand the franchise, the DNC calls upon the RNC to do its part in ensuring no American citizen is denied the right to participate in the electoral process.

We appreciate your suggestion of novel means of achieving this goal, which you envision in part as a joint initiative in targeted jurisdictions by the two political parties.

But what matters is not a public-relations gambit by the two political parties, but rather a commitment equally shared by both that the laws will be enforced by those federal and state agencies charged with protecting the constitutional and statutory rights of all our citizens. We look forward to your embrace of this fundamental proposition, and your active support for its fulfillment in practice at all levels of the Republican party and among its allies.

Yours truly,


Terence R. McAuliffe
Chairman
Democratic National Committee

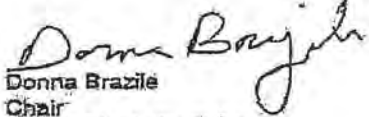

Donna Brazile
Chair
Voting Rights Institute

Exhibit 3

August 10, 2004

Dear Friend,

Congratulations! You recently registered to vote and you have taken the first step in being an active participant in the election process. Former President Ronald Reagan understood this when he said, "Freedom is never more than one generation away from extinction. We didn't pass it to our children in the bloodstream. It must be fought for, protected, and handed on for them to do the same, or one day we will spend our sunset years telling our children and our children's children what it was once like in the United States where men were free."

This election is about our future. A future focused on:

- Tax relief so hard working families can keep more of what they earn,
- Fighting and winning the war on terror, and
- High standards and real accountability in education.

Each state's laws differ on when and where you can vote. We at the Republican National Committee strongly believe in everyone's right to participate in our country's electoral process. Please take time to visit our website at www.gop.com/newvoter.

Sincerely,
The Republican National Committee

Paid for by the Republican National Committee. www.gop.org
Not authorized by any candidate or candidate committee

Exhibit 4

September 9, 2004

Dear Friend,

Congratulations! You recently registered to vote and you have taken the first step in being an active participant in the election process. Former President Ronald Reagan understood this when he said, "Freedom is never more than one generation away from extinction. We didn't pass it to our children in the bloodstream. It must be fought for, protected, and handed on for them to do the same, or one day we will spend our sunset years telling our children and our children's children what it was once like in the United States where men were free."

This election is about our future. A future focused on:

- Tax relief so hard working families can keep more of what they earn,
- Fighting and winning the war on terror, and
- High standards and real accountability in education.

We in the Republican Party strongly believe in everyone's right to participate in our country's electoral process. We urge you to consider voting Republican. Please take time to visit our website at www.ohiogop.org.

Sincerely,

Bob Bennett
Chairman, Ohio Republican Party

Exhibit 5

Akron Beacon Journal (Ohio)

September 29, 2004 Wednesday 4X EDITION

SECTION: A; BRIEF; Pg. 1

LENGTH: 1055 words

HEADLINE: Suspicious voter cards are piling up;
Huge Ohio registration effort brings new voters, problems

BYLINE: By Lisa A. Abraham; Beacon Journal staff writer

BODY:

As voter registration cards continue to pour into boards of elections across Ohio, instances of alleged voter registration fraud are growing.

In Summit County, suspected fraudulent voter registration cards continue to trickle in on top of the more than 800 already under scrutiny, according to Board of Elections Deputy Director John Schmidt.

The county sheriff, the state Bureau of Criminal Identification and Investigation, and the Ohio attorney general are investigating the cards received by Summit County.

As of Tuesday, the office had a stack of 3,000 voter registration cards that still had to be verified, Schmidt said.

Monday is the state's deadline for voter registration for the Nov. 2 election.

With Ohio's position as a must-win state in the presidential election, canvassers have been conducting an unprecedented voter registration effort that is expected to result in as many as 300,000 new registered voters.

But the glut of registration cards has brought problems.

In Mahoning County, Elections Director Michael Sciortino said he has flagged 48 voter registration cards that were part of a group of about 325 submitted by the NAACP in Cleveland.

Sciortino said he will wait until after the Oct. 4 registration cutoff to present them to his board and forward them to the county prosecutor for investigation.

The number, he said, is high even for a presidential election year. Sciortino couldn't recall any problem registrations in 2000, but noted that voter registration in general has far exceeded 2000 totals.

Since January, Mahoning County has registered about 12,500 new voters, with about 1,000 registration cards waiting to be verified and more coming in daily.

Similar handwriting

Sciortino said the registration cards originated from the Cuyahoga County Board of Elections. Many appeared to be in the same handwriting, and as his staff has attempted to verify them, they have been told repeatedly, "I didn't sign that card," he said.

Carlo LoParo, spokesman for Ohio Secretary of State J. Kenneth Blackwell, said his office does not serve as a clearinghouse for possible voter registration fraud, so the problems they know of are ones that have received a lot of media attention, like Summit and Lake counties.

In Lake County, elections officials found more than 100 questionable voter registration forms and absentee ballot applications, including an attempt to register at least one deceased person to vote, said Linda Hlebak, deputy director of the Lake County Board of Elections.

"We have had some trouble," she said, adding that the investigation has been turned over to the Lake County prosecutor.

She said the Lake board sends out postcards to confirm registrations. When the cards start coming back as undeliverable due to nonexistent addresses, it's an indication that there are problems, Hlebak said.

LoParo said the county sheriff or prosecutor is the appropriate agency to investigate cases of suspected fraud.

Increased vigilance

In this political season, when voter registration campaigns are working at a record pace, LoParo said boards of elections have had to be increasingly vigilant.

"There are laws established to deal with election violations or voter fraud. They will be enforced this year... We take voter fraud very seriously," he said.

Even less populated counties have had problems.

Portage County Elections Director Lois Enlow said her office has about a dozen suspected fraudulent registration cards her board is expected to hand over to its county prosecutor.

Some in the group actually were forwarded to Portage County from officials in Summit County and the Secretary of State's office after the addresses on the cards were determined to be in Portage County, she said.

"We're not handwriting experts, but we can see that that one looks an awful lot like this one," she said.

Enlow said her office rarely has problems, so the dozen questionable registration cards are unusual. "I don't recall having even that many," she said.

Since before the March primary election, problems have been noted in counties including Cuyahoga, Franklin, and Trumbull.

In Canton, Stark County Elections Director Jeff Matthews said he's had about four questionable registration cards, but the problem is not as widespread as other areas.

A bigger problem has been the numerous duplicate registration cards that have been submitted for voters who already are registered legally.

Often when a canvasser approaches, a voter will simply register again, and sometimes, again, he said.

"People just keep filling out the forms. We're encountering more as we're working through our backlog," he said.

"I've been here 18 years and I've never seen such a high volume of registrations come in so quickly," said Susan Strasser, director of the Medina County Board of Elections.

Her office hasn't had any problems so far, but she's been watching for it because of problems in other counties.

"That's so hard to police," she said.

Strasser said her staff can compare handwriting on signatures on registration cards, but similar patterns may only be detected if the cards arrive in the same batch.

"We're really keeping an eye out for that. We're scrutinizing each signature. But it can come in a week later," she said.

Plus, she said fictitious addresses may be easy to discover, but fictitious voters at real addresses are found only if the person actually living at the residence bothers to call and alert the elections board about the situation.

If the actual resident receives a confirmation card with another person's name on it and tosses it in the trash, that fictitious voter could get registered.

"I don't know how you police something like that," Strasser said. "Fraud can be done anywhere."

Stephen Brooks, associate director of the Bliss Institute for Applied Politics at the University of Akron, said the concern that the election may be turned by illegally registered voters is unlikely.

"The boards of elections are very competent and their systems are designed to prevent those people from voting... They are designed to prevent illegal voting and to promote legal voting and in general they do a relatively good job," he said.

The Cincinnati Enquirer

October 20, 2004 Wednesday Final Edition

SECTION: NEWS; Pg. 1A

LENGTH: 812 words

HEADLINE: Thousands of new-voter cards in Ohio undeliverable

BYLINE: By Jim Siegel Enquirer Columbus Bureau

BODY:

COLUMBUS - Thousands of cards mailed by county election boards to newly registered voters in Hamilton County and throughout the state are being returned because the people can't be found.

John Williams, director of the Hamilton County Board of Elections, said the situation indicates that there might not be as many new voters as some expect in a state deemed crucial in the presidential election.

Ohio Republican Party Chairman Robert Bennett on Tuesday said it's a result of statewide registration fraud conducted by independent groups that support Democratic candidates.

"By most accounts, their work can only be considered sloppy, haphazard and, in some cases, downright illegal," Bennett said, noting that the state party plans to take out full-page ads in Ohio newspapers encouraging citizens to stop voter fraud.

Democratic Party spokesman Dan Trevas said the fraud uncovered in Ohio equates to "minor errors" when viewed in the bigger picture.

"The vast majority of those registered for the first time are intent on voting," he said.

Bennett cited instances in 10 counties where potentially fraudulent voter registration forms were submitted.

He said many were submitted by groups he terms "auxiliaries of the Democratic Party": the Association of Community Organizations for Reform Now (ACORN) and America Coming Together.

The groups paid people to register voters. Some registrations were filled out for dead people, some contained fake addresses, and others named fiction characters such as Dick Tracy and Mary Poppins.

Jess Goode, spokesman for ACT in Ohio, has denied wrongdoing by his group. He said the Republican Party is scared of the number of new Democratic voters headed to the polls in two weeks.

An estimated 7.9 million people have registered in Ohio, up from 7.1 million at the beginning of the year.

Williams is currently investigating fraud by someone working for ACORN who he said submitted voter registrations for about 35 people who don't exist.

Newly registered voters in Hamilton County are mailed a card telling them where to vote and what political districts they live in. But thousands of those cards were returned because the people, or the addresses listed on voter registration forms, couldn't be found.

"There is quite a number," Williams said, noting that not every returned card is a suspected case of fraud. "People do actually move."

State GOP records, confirmed by Williams, show that through Oct. 4, Hamilton County mailed 63,403 cards to new registrants, and 4,152 were returned-- a rate of 6.6 percent.

The number was third-highest in the state behind Cuyahoga County's 14,461 and Franklin's 6,917, according to GOP records. In Butler County, 255 cards mailed to new voters were returned, while 24 were returned in Warren County, according to GOP records. Clermont County numbers were not available.

Tim Burke, chairman of the Hamilton County Democratic Party and the county elections board, said an updated number of cards returned is 5,808 out of 150,000 mailed not only to new voters, but also to those changing addresses, for a return rate of less than 4 percent.

Burke said fraud makes up a small percentage of the hundreds of thousands of newly registered voters in Ohio.

"I think Republicans are attempting to justify what they intend to do on Election Day by raising questions of voter fraud and overplaying this," he said.

What both the Democratic and Republican parties in Ohio intend to do is use a 51-year-old law that allows them to place challengers at polling sites. The parties are recruiting lawyers, law students and others to ensure that people are allowed to vote, or to potentially challenge voters' eligibility.

Bennett said his efforts are likely to focus on heavily Democratic areas where many new voters have been registered. Democrats expect to match the effort.

As further evidence of registration fraud, Bennett said the Ohio Republican Party sent out its own letters to newly registered Ohio voters, encouraging them to vote Republican.

In the counties where new registration was highest, 3 percent to 9 percent of the letters were returned because the people were not located.

"I can say . . . as someone who's been in state politics for 40 years, that the normal rate of return is less than 1 percent," he said. "These results are really unprecedented and frightening."

Ed Gillespie, chairman of the Republican National Committee, joined Bennett Tuesday and said Ohio's issues of voter registration fraud cases are harming and part of a national problem.

"Whether it's for profit motive or political motive, fraud is being committed in the registration process in a way that makes more possible fraud on Election Day," he said.

"I'll bet you this. If Mary Poppins and Dick Tracy vote on Election Day, they'll vote for John Kerry."

Exhibit 6



Mary Poppins prompts investigation

(CNN) — Ohio authorities say a man was charged Monday with filling out more than 100 fictitious voter registration forms, some in names such as Disney character Mary Poppins and pop singer Michael Jackson.

Chad Staton, 22, of Defiance County in northwestern Ohio, was to receive money for each registration form he could persuade potential voters to fill out, said Sheriff David Westrick.

Instead, Staton, himself, filled out the forms and returned them to the Toledo woman who hired him. Sheriff's deputies allege he was paid in crack cocaine instead of money.

Staton had his first court appearance Monday on a felony charge of false registration, and was released on his own recognizance. He has another court appearance scheduled for Friday.

Westrick said the Toledo woman, Georgianne Pitts, 41, told officers she was recruited by Thaddeus Jackson II of Cleveland to obtain voter registrations. He said a business card provided by Pitts indicated that Jackson is the assistant Ohio director of the NAACP National Voter Fund.

Westrick said he didn't know the legal status of Pitts and Jackson, who live outside his jurisdiction.

Greg Moore, the executive director of the NAACP National Voter Fund, said: "We believe anyone violating the law hurts the credibility of NVF and more importantly the thousands of hard-working men and women who are legally registering people to vote."

According to its Web site, the National Voter Fund advances the cause of civil rights through advocacy, educating voters on candidates' stands on civil rights and increasing voter turnout in the African-American community.

The sheriff added that deputies and Toledo police had obtained a search warrant for the house where Pitts lives. He said officers confiscated drug paraphernalia and voter registration forms from the home.

Westrick said Pitts admitted paying Staton crack cocaine for the registrations in lieu of money. Westrick said he didn't know the legal status of Pitts and Jackson, who live outside his jurisdiction.

Westrick said his office began an investigation after a complaint was made by the Defiance County Board of Elections. The board received the forms from the Cuyahoga Board of Elections. Cuyahoga County includes Cleveland.

Westrick said officials became suspicious because the handwriting on the forms was similar. In some cases, there were dozens of addresses for a single block in Defiance, where there are only a couple of homes, he said.

But the biggest giveaway may have been the names themselves.

"Mary Poppins hasn't voted here in a long time. Michael Jackson hasn't. Those were some of the fictitious names," Westrick said.

Find this article at:

<http://www.cnn.com/2004/LAW/10/18/mary.poppins.registers.to.vote>

Exhibit 7

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The Columbus Dispatch

Columbus Dispatch (Ohio)

September 8, 2004 Wednesday, Home Final Edition

SECTION: NEWS; Pg. 02B

LENGTH: 434 words

HEADLINE: FRANKLIN COUNTY GRAND JURY;
WORKER ACCUSED OF FALSIFYING VOTER FORM

BYLINE: Robert Vitale, THE COLUMBUS DISPATCH

BODY:

A part-time worker signing up new voters for a local community group has been indicted by a Franklin County grand jury on charges he forged a registration form.

Kevin Eugene Dooley, 45, was indicted on two counts: submitting a false election registration form and submitting a false signature. Both are felonies, punishable by up to a year in prison and a \$2,500 fine.

The charges stem from an investigation that began in May after the Franklin County Board of Elections discovered dozens of voter registration forms with fake names or false information. They were submitted by the Association of Community Organizations for Reform Now, or ACORN, which paid workers bonuses based on the number of voters they registered.

County Prosecutor Ron O'Brien said yesterday that the indictment is the first of its type during his seven years in office.

"It's a rare kind of charge," he said. "Usually you don't have the kinds of intense registration efforts going on by both parties and interest groups."

About 94,000 new voters have been registered so far this year in Franklin County, which surpasses the total number of new voters signed up in the 2000 presidential election year. As of May, there were 755,000 county residents registered to vote.

ACORN is one of a number of liberal groups that have paid workers to register voters in urban areas, particularly poorer neighborhoods that traditionally vote for Democrats. Another group, America Coming Together, came under criticism this summer after the Associated Press reported it employed felons to conduct door-to-door registration in Ohio and other states.

An arrest warrant was delivered to Dooley's last known address on the North Side, but he was still at large yesterday.

ACORN officials could not be reached for comment. O'Brien said Dooley was one of two workers the group fired shortly after the sheriff's office began investigating the fake names and forged signatures.

The group also began performing its own checks on information submitted by its workers, and Board of Elections Director Matthew Damschroder said the extra step has cut down on the number of questionable forms submitted to his agency.

"They're doing a lot of filtering," he said of groups conducting their own voter-registration drives. "No organization doing voter registration on the street wants to be tagged."

O'Brien said that although a number of forms have had falsified information, investigators were unable to trace them to anyone else. Dooley is accused of forging just one form, of a woman he attempted to contact.

Exhibit 8

The Cincinnati Enquirer October 8, 2004 Friday Final Edition
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The Cincinnati Enquirer

October 8, 2004 Friday Final Edition

SECTION: METRO; Pg. 1C

LENGTH: 397 words

HEADLINE: Alleged fraudulent voter cards scrutinized

BYLINE: By Cindi Andrews Enquirer staff writer

BODY:

19 in Hamilton Co. suspected

Hamilton County election officials will meet this morning to discuss 19 voter registrations for people who may not exist, which would be a rare case of election fraud.

Board of Elections Director John Williams subpoenaed those named on the voter registration cards after similar handwriting and false addresses raised election workers' suspicions. The sheriff's department could not find them, he said.

The cards were turned in, Williams said, by someone affiliated with the Association of Community Organizations for Reform Now (ACORN), a group that represents low-income people.

"We have a very extensive fraud detecting process," said Dierdre Murch of ACORN. "If this is true, I don't know how they got there."

Officials in Columbus are also investigating possible improprieties by an ACORN worker there.

ACORN has registered more than 1 million new voters nationwide, including 158,036 in Ohio, according to its Web site, www.acorn.org.

Murch said she took 526 new voter registrations to the board of elections late Thursday that the group found in a mismarked box and are asking the board to accept even though the deadline was Monday.

Ohio is under unprecedented scrutiny over its election process this year as a battleground state in what is expected to be a close presidential election. Unprecedented levels of voter interest also resulted in record numbers of new voter registrations.

State and local officials say those factors contributed to an unusually high number of potential election fraud cases. Lake and Summit counties are investigating over 1,000 potential instances of voter registration fraud.

By comparison, Hamilton County's 19 potential fraud cases out of the 68,728 new

voter registrations tallied so far appear to be a pretty small number, Board of Elections Chairman Tim Burke said.

The Board of Elections can refer election fraud for prosecution if it decides there was malicious intent. It's a felony and carries a possible sentence of up to one year in jail and a \$2,500 fine.

The only other incidents Burke could remember in his dozen years on the board involved candidate petitions. In 2001, four women were sentenced to 30 days in jail each for signing fake names on petitions they were supposed to be circulating for would-be congressional candidate Jim Condit Jr.

Exhibit 9

Columbus Dispatch (Ohio) June 5, 2004 Saturday, Home Final Edition
Copyright 2004 The Columbus Dispatch

The Columbus Dispatch

Columbus Dispatch (Ohio)

June 5, 2004 Saturday, Home Final Edition

SECTION: EDITORIAL & COMMENT; Pg. 08A

LENGTH: 381 words

HEADLINE: QUALITY, NOT QUANTITY;

Per-name reward system can encourage fraud in solicitation of voters

BODY:

Paying people to register voters or to gather signatures for ballot petitions is an established practice in Ohio, and it often is necessary to get worthy candidates and issues on the ballot.

But making it into piecework -- paying workers by the signature or by the registration card -- inevitably raises the chance that some will inflate their productivity by making up names.

If political interest groups want to maintain the right to do paid electioneering, they had better police their employees vigilantly.

Franklin County elections officials said recently that two groups -- Project Vote and the Association of Community Organizations for Reform Now, also known as ACORN -- turned in several of what appear to be fraudulent forms, some of which bore the names of people already registered to vote.

Although ACORN and Project Vote officials said they check as many as 75 percent of the cards turned in by their paid collectors, some fraudulent cards apparently were undiscovered and passed on to the Board of Elections.

The fraud was discovered when elections employees sent notification cards out to the "new" voters, who, in turn, told the board of the mistakes.

ACORN, which advocates on behalf of the poor and says it has registered 23,000 voters since fall, made the right move by firing two employees who turned in cards that turned out to be fake. A third person already had quit.

Franklin County elections Director Matthew Damschroder would like to see more. Pointing out that knowingly turning in false election information is a felony, he has called for prosecution of those suspected.

The call is on target. While the perpetrators most likely were interested making money, not stealing an election, officials should send the message that the accuracy of voter-registration rolls is too important to trifle with.

Paid petitioning and registration are probably an inescapable fact of political life; few

organizations attract enough volunteers to gather the thousands of signatures typically needed to put something on the ballot or register thousands of new voters.

Given the problems inherent in paying per signature, however, groups that use the practice strongly should consider paying only an hourly rate and avoiding any per-signature premiums.

September 7, 2004, Tuesday, BC cycle The Associated Press State & Local Wire
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Associated Press

September 7, 2004, Tuesday, BC cycle

SECTION: Political News

LENGTH: 247 words

HEADLINE: Warrant issued for false registration

DATELINE: COLUMBUS, Ohio

BODY:

A warrant was issued for a parolee accused of forging a signature on a voter registration form, Franklin County Prosecutor Ron O'Brien said Tuesday.

A grand jury indicted Kevin Eugene Dooley, 45, of Columbus, on one felony count each of false election registration and submitting false election signatures, O'Brien said.

If convicted, Dooley could be sentenced from six months to one year in prison on each count. He was released on parole in November while serving a six-to-25-year sentence for receiving stolen property, escape and breaking and entering, O'Brien said.

Dooley was employed by the Association of Community Organizations for Reform Now, or ACORN, associated with the nonprofit Project Vote, a national group that registers low-income and minority voters, O'Brien said.

Dooley submitted a card bearing a woman's name to the Franklin County Board of Elections that had a forged signature, the indictment said. Dooley's pay included a fee for each new voter he registered beyond a certain goal, according to the indictment.

In June, ACORN fired a worker over several dozen forms submitted to Franklin County elections officials that were duplicates or had false information, the group's organizer said.

ACORN organizer Katy Gall said the group would cooperate with prosecutors. The forms were traceable because workers initial them, she said. A telephone call Tuesday to a number listed for Gall was not answered. There was no listing for Dooley.

Two Ohio Voter-Registration Workers Fired

Published: Jun 03, 2004 2:01 PM EST

COLUMBUS, Ohio (AP) - Two workers with a community activist group's voter-registration campaign were fired after authorities determined they submitted fraudulent forms to election officials.

The workers were collecting voter registrations for the Association of Community Organizations for Reform Now, or ACORN, when they turned in the forms, which were duplicates or contained false information.

The group agreed Wednesday to perform extra checks on its paperwork. "This just makes it harder for everybody," organizer Katy Gall said. "We definitely are glad we were able to catch it at this stage."

Matthew Damschroder, director of the Franklin County Board of Elections, blamed a bonus paid to workers based on the number of new registrations they collected.

"It's not the organization per se that's problematic — it's the individuals," he said. "I don't believe there's anyone out there masterminding a program to throw an election."

ACORN workers are paid \$6.25 an hour and have registered 23,000 new voters in the county since last fall.

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Associated Press

September 26, 2004, Sunday, BC cycle

SECTION: Political News

LENGTH: 503 words

HEADLINE: Late voter registrations could cause Election Day havoc

DATeline: CLEVELAND

BODY:

Voter advocates worry that a flood of new registrations and address changes will lead to confusion and lost votes on Election Day.

In Ohio's largest counties, election boards are getting nearly double the number of registration cards submitted in 2000. The scramble is only expected to intensify this week, as the Oct. 4 registration deadline nears.

"We think this will be the sleeper issue in this election," said Kay Maxwell, national president of the League of Women Voters. "Plenty of people can fall through the cracks."

Ohio is so crucial in this year's presidential campaign that voter registration groups are stepping over each other to locate every unregistered resident.

"Ohio's the subject of such a national focus that we're almost drowning each other," said Josh Gildrie, state coordinator for the New Voters Project. "It's absolutely amazing what's going on."

Election boards across the state have hired extra staff members, extended working hours, or both to process cards. Some boards are processing them 24 hours a day.

At Cuyahoga County's elections board, Ohio's largest, about 20,000 cards sat in bins last week, waiting to be checked and entered into computers. Director Michael Vu said the board will spend about \$175,000 on extra workers to process the cards. He expected to eliminate the backlog over the weekend.

John Williams, Hamilton County's elections director, said the backlog was still about 5,000 last week - down from 14,000.

"This is an election unlike anything 30-year pros have seen," he said.

Surveys show the majority of the new voters appear to be Democrats, said Dennis

Lieberman, the Democratic Party chairman in Montgomery County. Volunteers have called a significant number of the 25,000 newly registered voters in Montgomery County, and three-quarters have identified themselves as Democrats.

Some local election officials say voter groups bear responsibility for the registration backlog because they have turned in too many cards that are duplicates or incomplete, forcing the boards to track down the voters.

In Cuyahoga County, for instance, Project Vote and the Association of Community Organizations for Reform Now, or ACORN, worked together to submit the most cards. But they also produced the highest percentage - about 15 percent - of incomplete cards.

Candy Roberts, ACORN's voter registration coordinator, said the organization had problems at first but tightened its procedures to reduce errors and possible fraud.

"We can't tell when we meet someone on the street if they're not being honest with us," she said.

Republicans have been critical of Project Vote, ACORN and other groups that pay canvassers to register voters, many in Democratic-leaning areas.

Jason Mauk, a spokesman for the Ohio Republican Party, said sloppy work by the groups has overloaded election boards.

"Our concern is that cases of fraud will slip through," he said. "This could raise challenges to ballots and wreak havoc on Election Day."

Exhibit 2

1 UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF NEW JERSEY
3 ----- x
4 DEMOCRATIC NATIONAL COMMITTEE,)
5 et al.,)
6 Plaintiffs,)
7 v.) C.A. No. 813876
8 REPUBLICAN NATIONAL COMMITTEE,)
9 et al.,)
10 Defendants.) PAGES 1- 164
11 ----- x

12

13

14 DEPOSITION OF MARIA CINO

15 Friday, October 29, 2004

16 Washington, D.C.

17

18

19

20

21 Reported by: Sara A. Watt

22 Job No. 163933

1

2

3

4

October 29, 2004

5

5:17 p.m.

6

7 Deposition of MARIA CINO, held at the offices of

8

9 McDermott, Will & Emery

10 600 Thirteenth Street, Northwest

11 Washington, D.C. 200053096

12

13 Pursuant to notice, before Sara A. Watt, Registered

14 Merit Reporter and Notary Public in and for the

15 District of Columbia.

16

17

18

19

20

21

22

1 ON BEHALF OF THE PLAINTIFF INTERVENOR EBONY

2 MALONE:

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4 Patricia G. Butler, Esquire

5 Howrey, Simon, Arnold & White

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12 1730 M Street, NW.

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16 ON BEHALF OF THE PLAINTIFF DNC:

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18 Genova, Burns & Vernoia

19 Eisenhower Plaza II

20 354 Eisenhower Parkway

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1 P R O C E E D I N G S

2 Thereupon,

3 MARIA CINO

4 A witness, called for examination by counsel for
5 the Intervenor, and, after having been sworn by the
6 notary, was examined and testified as follows:

7 THE WITNESS: I do.

8 EXAMINATION BY COUNSEL FOR PLAINTIFF INTERVENOR

9 BY MR. NIELDS:

10 Q. Can you state your name for the record?

11 A. Certainly. Maria Cino.

12 Q. Thank you. I wasn't positive how that
13 last name was going to be pronounced.

14 A. It has been pronounced differently in
15 different places, let me tell you.

16 Q. Ms. Cino, my name is John Nields and I
17 represent the Plaintiff Intervenor Ebony Malone in
18 this matter. And we're taking this deposition, as
19 I'm sure you're aware, pursuant to authorization of
20 the court of yesterday. Appreciate your being
21 here.

22 And I'll be asking you questions. If any

1 of them are unclear, just tell me and I'll reframe
2 them.

3 A. All right.

4 Q. And with that, I'm ready to proceed if
5 you are.

6 A. I am.

7 Q. Good. Okay. Can you just-- first,
8 let's start off with your current job.

9 A. Sure.

10 Q. What is it?

11 A. I am the deputy chairman for the
12 Republican National Committee.

13 Q. And how long have you been in that
14 position?

15 A. A little over a year. I went to the
16 committee June of 2003. I guess it's a little more
17 than a year, a little over a year.

18 Q. And what was your job before that?

19 A. I was working at the Department of
20 Commerce as the assistant secretary and the
21 director general for the United States Foreign
22 Commercial Service. It's a long title. It's a

1 great job, though.

2 Q. And how long were you in that job?

3 A. Two years.

4 Q. And before that?

5 A. I was at the Republican National
6 Committee.

7 Q. In what capacity?

8 A. As deputy chairman for Victory 2000,
9 political and congressional.

10 Q. Political and congressional?

11 A. Affairs, I'm sorry.

12 Q. And how long were you in that job?

13 A. Approximately seven months.

14 Q. Okay. Before that?

15 A. I was the national political director for
16 the Bush Campaign 2000.

17 Q. How long did you hold that position?

18 A. 16 months. It was long.

19 Q. And before that?

20 A. I was a senior advisor at the law firm of
21 Wiley, Rein & Fielding.

22 Q. For how long?

1 A. Two years.

2 Q. We're going in reverse direction from
3 normal.

4 A. That's okay.

5 Q. And before that?

6 A. I was the executive director of the
7 National Republican Congressional Committee for
8 four years.

9 Q. And before that?

10 A. I was the chief of staff for Congressman
11 Bill Paxon for four years.

12 Q. Any particular duties?

13 A. I'm sorry?

14 Q. Any particular duties as chief of staff?

15 A. I'm not sure I understand the question.
16 I managed the staff from the political to
17 legislative in Washington and Buffalo, New York.

18 Q. Before that?

19 A. I was the campaign manager for Bill Paxon
20 for Congress.

21 Q. I think we've gone back far enough.

22 If you can just tell us your educational

1 background.

2 A. Sure. I have a liberal arts degree from
3 St. John Fisher College in Rochester, New York.

4 Q. And you are from originally?

5 A. Buffalo, New York.

6 Q. I want to ask you a few questions about
7 the structure of the RNC.

8 A. Sure.

9 Q. First of all, what is it? What is the
10 RN -- what is the RNC?

11 A. Republican National Committee is the
12 organization that helps elect and reelect
13 Republicans throughout the country.

14 Q. And does it have a governing body?

15 A. Yes, it does.

16 Q. And what is that body?

17 A. Governing body is made up of, besides the
18 chairman and the co-chairman who are elected, they
19 are elected by the members, a chairman from each of
20 the 50 states and a national committeeman and woman
21 from each of the 50 states.

22 Q. Okay. So-- and that's the committee, is

1 that the Republican National Committee?

2 A. Yes.

3 Q. And just to make sure I have this right,
4 does that make 53 members of the committee?

5 A. No. There's 165 members of the national
6 committee. And I would have to doublecheck on
7 that for you, I apologize, but it's three members
8 per state and the territories.

9 Q. Three members per state?

10 A. Uh-huh.

11 Q. All right.

12 A. That's 150.

13 Q. Okay. Then I misunderstood you in the
14 beginning. Let me follow up a little bit.

15 Is one of the members from each state the
16 chairperson of the state Republican Committee?

17 A. I'm sorry, yes.

18 Q. Okay.

19 A. There is a state chair for each of the 50
20 states, one, and one national committeeman and one
21 national committeewoman.

22 Q. I see. From each state?

1 A. Yes.

2 Q. I see. Okay. Now I understand you.

3 And in addition does the chairperson of
4 the committee come out of that 150 people, or is
5 that an additional person?

6 A. That is an additional person.

7 Q. Who is elected by the 150?

8 A. Yes. And, I apologize, it's 150 plus
9 several of the territories. We just added American
10 Samoa, Guam, and Puerto Rico. And then we have
11 chairman, co-chairman, and officers within, a
12 treasurer.

13 Q. Okay. I just want to stay for the moment
14 -- that are on the committee and that are in
15 addition?

16 A. I'm going to back up and I don't know
17 with regards to the treasurer, chief counsel, if
18 those are actually additional members of the
19 committee. I may have spoken too soon on that.

20 Q. Okay. Now, for example, would this mean
21 that the chair of the Republican Committee in Ohio
22 would be a member of the Republican National

1 Committee?

2 A. Yes.

3 Q. And that person's name is?

4 A. Robert Bennett.

5 Q. And who is the chair of the Republican
6 National Committee?

7 A. Ed Gillespie.

8 Q. Now, does the Republican National
9 Committee then have any employees, fulltime
10 employees?

11 A. Yes.

12 Q. And, first of all, approximately how
13 many?

14 A. It varies from election year to election
15 year, cycle to cycle. So right now we have
16 approximately 400 employees.

17 Q. And does the-- is the chair included as
18 an employee? Is the chair a paid, fulltime
19 employee of the RNC?

20 A. This chairman is apaid, full-time
21 chairman.

22 Q. Okay. Now, you mentioned that you were

1 deputy chairperson.

2 A. Yes.

3 Q. Where is that in the organizational
4 structure?

5 A. Underneath the chairman.

6 Q. Are there others that are equivalent?

7 A. No.

8 Q. You're the only deputy?

9 A. Yes.

10 Q. Okay. And then are there people under--
11 what's the next layer under you, what title would
12 they hold?

13 A. Directors of divisions.

14 Q. Okay. And how many divisions are there?

15 A. Admin, legal, political, finance,
16 communications.

17 Q. That's it?

18 A. Co-chair, co-chair has an office also.

19 And there's a member relations office.

20 Q. And who is the cochair?

21 A. Ann Wagner.

22 Q. All right. How many offices does the RNC

1 have?

2 A. One office.

3 Q. And do the employees work in that office
4 or they work other places?

5 A. Again depending on the election cycle,
6 some of the staff works out of the RNC's main
7 office here in Washington. We have a field staff
8 out of the political office that works and lives in
9 their individual states, but they don't necessarily
10 have offices.

11 Q. And are there people fitting that
12 category in every state?

13 A. No.

14 Q. How many?

15 A. We have eight regional field directors.

16 Q. And where are they?

17 A. Where they reside is not-- is part of
18 their territory. But they could live in the state
19 that they come from, which is usually the
20 geographical area that they represent as a regional
21 field political director.

22 Q. Now, I think you said that the RNC is

1 engaged in efforts to elect and reelect Republican
2 candidates --

3 A. Yes.

4 Q. -- throughout the country, yes?

5 A. Yes.

6 Q. And in order to do that, what are the
7 different functions that are conducted by the RNC?

8 MR. BURCHFIELD: Object to form.

9 THE WITNESS: The functions are services
10 that we would be able to offer in assisting
11 candidates in their elections.

12 BY MR. NIELDS:

13 Q. Okay. And what would be some examples of
14 that?

15 A. Training.

16 Q. Training who?

17 A. Training, which could be candidates, we
18 could train state party staff. We even train
19 attorneys.

20 Q. Don't envy you that job. And what
21 attorneys do you train?

22 A. Most of the STATE PARTIES have legal

1 counsels. The bigger ones have probably fulltime.

2 In addition--

3 Q. And you train them?

4 A. Excuse me?

5 Q. And you train them?

6 MR. BURCHFIELD: The RNC, you mean--

7 MR. NIELDS: Yes.

8 MR. BURCHFIELD: -- as opposed to her
9 personally?

10 BY MR. NIELDS:

11 Q. Yes, does the RNC train them?

12 A. Yes.

13 Q. Okay. I stopped you on training. I
14 think you were about to go on to other things that
15 you do.

16 A. Examples?

17 Q. Yes.

18 A. We assist them in fundraising.

19 Q. And let's stay with that justfor a
20 moment.

21 Where do the funds go that you raise?

22 A. That all depends on who they're being

1 raised for.

2 Q. What would be some examples?

3 A. Well, if we have a state party that
4 perhaps has secured a surrogate to go to a function
5 for them, we have expertise at the committee, a
6 regional finance person could go out to that
7 particular state and help put on that event with a
8 state party. Same would be true for a candidate
9 that perhaps needed assistance with an event. We
10 could assist in writing a direct mail piece for a
11 state party, a local party, a candidate.

12 Q. Does it ever include actually disbursing
13 funds to a state party?

14 A. Yes, the RNC can disburse funds to a
15 state party.

16 Q. Is that a normal thing for the RNC to do?

17 A. Depends on what you mean by "normal."

18 Q. Well, during the course of any give year
19 do you disburse directly to most or all of the
20 state parties?

21 A. During an election cycle we are known to
22 disburse money, probably more during election cycle

1 than a non-election cycle.

2 Q. To the state parties?

3 A. Could be to the state parties.

4 Q. And also to candidates?

5 A. We do make contributions to candidates.

6 Q. These are Republican candidates running
7 in the states?

8 A. Yes, sir.

9 Q. And also if there's a national candidate,
10 do you disburse funds to the national candidate?

11 A. Within the guidelines of the law, yes.

12 Q. Sure, sure. Okay.

13 So we've covered training and
14 fund-raising. Any other examples?

15 A. We have a communications department.

16 Q. Which does what?

17 A. Can help again state parties, local
18 party, candidates with communication plan, public
19 relations plan. Assist in putting on press
20 conferences, assist them with earned media
21 projects.

22 Q. When you say assist state parties with

1 communications, would that include assisting them
2 in formulating the nature of the communication and
3 the strategy of the communication?

4 A. I think that would be fair to say.

5 Q. Okay. Training, fund raising, and
6 communications. Any other examples?

7 A. We have a field staff and our political
8 organization, a field staff.

9 Q. And is this the field staff that you
10 testified about earlier?

11 A. I'm not sure.

12 Q. In the region, I think you said--

13 A. Yes.

14 Q. -- you had eight regional offices.

15 A. Yes, I'm sorry. I was wondering which
16 testimony you were talking about.

17 Q. Okay. And what does the field staff do?
18 What sorts of activities does the field staff do?

19 A. Our regional political directors assist
20 with writing political plans, with having a finance
21 component attached to that plan, voter
22 registration.

1 Q. And for-- for whom are these plans
2 written?

3 A. Candidates, for counties, county parties,
4 and some assistance sometimes with state parties.

5 Q. Any other examples?

6 A. It's kind of a onestop shop. You try to
7 do what you can to help elect a candidate or help
8 in an election. So sometimes you have many hats.

9 Q. Research?

10 A. Research falls under communications.

11 Q. I see. And is there a particular part of
12 the RNC that develops policy and strategies for
13 elections?

14 MR. BURCHFIELD: Object to form.

15 THE WITNESS: I would say strategies, not
16 policies.

17 BY MR. NIELDS:

18 Q. Strategies, and where would that fall?

19 A. Probably in all of the categories I
20 mentioned.

21 Q. Now, you've-- I think you've indicated,
22 I don't want to inaccurately summarize, but I think

1 you've indicated a number of ways in which the RNC
2 coordinates with and gives support to the state
3 Republican parties?

4 MR. BURCHFIELD: Object to form.

5 BY MR. NIELDS:

6 Q. Is that correct?

7 A. "Assists" would be a word I'd use.

8 Q. Okay. Is there-- does there tend to be
9 more or less of it in the case of a national
10 candidate like president and vice president, as
11 compared to a candidate that's just running in the
12 state?

13 A. I think that would depend on the
14 particular state.

15 Q. Well, it's no secret what the state is
16 that we care about here, which is Ohio.

17 A. Yes, sir.

18 Q. And so I'll ask the question this way.
19 Let's take this year, is there more assisting in
20 the presidential race or in local races in Ohio?

21 A. During a presidential year?

22 Q. Yes, during a presidential year.

1 A. Assistance to the state party of Ohio,
2 there's probably more assistance than if it were a
3 statewide or local elections.

4 Q. And is there-- you say assisting, but is
5 there consultation and joint strategizing?

6 A. To a certain degree. Again, I think it
7 depends on the level of the state party.

8 With regards to the Ohio state party,
9 it's -- it is the premier party, Republican state
10 party. They have a chairman who's been there 18 to
11 20 years. He's been the longest sitting state
12 party chairman. He's got a significant staff of 20
13 plus. It's probably triple that during a
14 presidential year.

15 So there is some assistance, but probably
16 not -- probably not as much as we'd give to maybe
17 even a smaller state or a state that wasn't as
18 sophisticated as the Ohio state party with
19 continued leadership.

20 Q. And you're referring, I take it, to
21 Mr. Bennett?

22 A. Yes.

1 Q. Are there any-- do you have any joint
2 committees with the Ohio state party?

3 MR. BURCHFIELD: Object to form.

4 THE WITNESS: I'm not really sure I
5 understand the question, joint committees.

6 BY MR. NIELDS:

7 Q. Well, that may be because I don't
8 understand it, either.

9 A. Okay.

10 Q. But is there something called the 2004
11 Joint Victory Committee?

12 A. There is a-- the 2004 Victory
13 Committee -- you know what, I can't say that the
14 word "joint" is in there.

15 Q. Okay.

16 A. I honestly could not say that for sure.

17 Q. Okay. But there is a 2004 Victory
18 Committee?

19 A. There is a 2004 Victory staff,
20 organization, which is essentially a staff that the
21 Republican National Committee has working on the
22 ground on behalf of the presidential.

1 Q. But is there-- is there -- is there a
2 2004 Victory Committee that is joint between the
3 RNC and one or more state parties?

4 MR. BURCHFIELD: Objection to the
5 question.

6 THE WITNESS: No, I'm afraid I don't.

7 BY MR. NIELDS:

8 Q. Is there a-- have you ever heard of some
9 organization, some committee that operates out of
10 228 South Washington Street in Alexandria?

11 A. Out of 228 South-- no.

12 Q. You haven't?

13 A. No.

14 Q. Okay. Now, I'm going to ask you some
15 questions on the general topic of vote fraud.

16 A. Sure.

17 Q. Is that a topic that has been an issue
18 for the RNC in this election cycle, 2004?

19 MR. BURCHFIELD: Object to form.

20 THE WITNESS: Based on the news accounts
21 over the past several months, it is certainly a
22 concern of the National Committee.

1 BY MR. NIELDS:

2 Q. And has the National Committee tried to
3 develop strategies to combat vote fraud?

4 A. As you know, because of the consent
5 decree, we do not participate in any type of voter
6 ballot integrity or ballot integrity programs.
7 Ballot security, sorry.

8 Q. Okay. You may have answered my question,
9 but I'm not sure. I was asking whether the RNC has
10 tried to develop strategies for combatting vote
11 fraud.

12 A. No.

13 MR. BURCHFIELD: Mr. Nields, I am
14 assuming your questions are with direct reference
15 to Florida, which is my understanding what the
16 court has ordered this deposition to focus on.

17 MR. NIELDS: I don't think you meant to
18 say that. I think that's Ohio.

19 No, I'm not just focusing it on Ohio.
20 This is a general background question.

21 MR. BURCHFIELD: Well, I think the-- I
22 think the deposition, the Court made clear

1 yesterday, more clear than I'm apparently making,
2 that the deposition must focus on Ohio.

3 MR. NIELDS: Well, of course it's going
4 to focus on Ohio, but just as I asked her her
5 background, I'm-- it is relevant to Ohio to find
6 out whether there are-- the RNC has developed or
7 engaged in efforts to put together a strategy to
8 deal with the problem or perceived problem of vote
9 fraud.

10 MR. BURCHFIELD: All right. I will-- I
11 will instruct the witness to answer your questions
12 with regard to Florida -- with regard to Ohio,
13 because that is what the court indicated that this
14 deposition is going to focus on and that's what she
15 is being presented as the RNC's 30(b)(6) witness to
16 respond to. She is not within the scope of her
17 testimonial mandate to testify about strategies
18 nationally, only about strategies with regard to
19 Ohio.

20 BY MR. NIELDS:

21 Q Are you going to accept that, follow your
22 lawyer's instruction?

1 A. Yes.

2 MR. NIELDS: Okay. I want that question
3 marked.

4 I want document number 13. Let's mark
5 this -- I'm going to forget these numbers doing it
6 this way, but I want that marked Exhibit 1, Cino
7 Exhibit 1.

8 (Exhibit 1
9 marked for identification.)

10 BY MR. NIELDS:

11 Q. I put in front of you a document marked
12 Cino Exhibit 1. It is a news article from the
13 Middletown Journal and its headline, "GOP Charges
14 Voter Fraud in Ohio".

15 A. Yes.

16 Q. And first of all, have you seen this
17 before?

18 A. Yes, I have.

19 Q. Okay. I'm going to direct your attention
20 to the first paragraph which reads, "Republican
21 National Committee chairman Ed Gillespie on Tuesday
22 joined Ohio Republican Party Chairman Bob Bennett

1 in launching a media campaign to counter what they
2 called widespread voter registration fraud in nine
3 Ohio counties."

4 Do you see that?

5 A. I do indeed.

6 Q. And to your knowledge is that true, that
7 that happened?

8 A. Ed did attend-- Chairman Gillespie did
9 attend a press conference with Chairman Bennett
10 where voter registration fraud was discussed.

11 Q. Well, is it true that they launched a
12 media campaign to counter widespread voter
13 registration fraud?

14 A. I would not call it a media campaign
15 strategy on the part of the National Committee, as
16 much as on the part of the state party of Ohio.

17 MR. NIELDS: Okay. I'd like this marked
18 Exhibit 2.

19 (Exhibit 2
20 marked for identification.)

21 BY MR. NIELDS:

22 Q. Okay. Ms. Cino, I put in front of you a

1 document marked Exhibit 2. It is a-- purports to
2 be a Wall Street Journal article dated October
3 22nd.

4 And my question is have you seen this
5 before?

6 A. I have not.

7 Q. Want to take a minute to look at it?

8 A. I will appreciate that, thank you.

9 (Pause in the proceedings.)

10 THE WITNESS: Okay.

11 BY MR. NIELDS:

12 Q. Have you had a chance to look at it?

13 A. I did, thank you.

14 Q. It begins with the statement, "Wisconsin
15 Republicans are conducting background checks on
16 roughly 100,000 newly registered voters." Then in
17 the second paragraph it said, "The project,
18 informally called Election Integrity Program, is a
19 model for similar efforts Republicans are launching
20 nationwide to counter massive voter registration
21 efforts conducted by the Democratic-leaning groups
22 this year." And then at the end of that paragraph

1 it says, "Republicans have been working just as
2 feverishly to make voter fraud a top priority."

3 To your knowledge, is it true that the
4 Wisconsin project was a model for similar
5 Republican efforts nationwide?

6 A. I think each state party has taken the
7 issue of voter fraud differently and is handling it
8 differently, and I can't say that the Wisconsin
9 party is a model for the other states.

10 Q. Okay. On the second page of this exhibit
11 in the middle there's a paragraph that begins, The
12 Republican antifraud campaign is being shepherded
13 by the Republican National Committee headquarters,
14 with help throughout the party."

15 Is that statement true?

16 A. The Republican National Committee offers
17 assistance with legal matters, one of which would
18 be voter fraud if there were questions. We have
19 counsel that can help answer questions during the
20 campaign season. We, as we get closer to election,
21 have a 1-800 number. And as I said earlier, we do
22 training for our attorneys out in the field.

1 But as far as shepherding, I'm not sure
2 that I would use that word, that we're shepherding.
3 Again, I think each state party takes on the voter
4 fraud issue in a different way. We offer legal
5 counsel and advice.

6 Q. At the bottom of the first page there's a
7 paragraph that begins, "At national party
8 gatherings, Republican state chairmen have been
9 comparing notes, exchanging ideas and sharing
10 results from trial runs of antifraud
11 poll-monitoring efforts during the 2002 campaign
12 and a myriad of special elections."

13 Is that a true statement to your
14 knowledge?

15 A. I can't say that they're national party
16 gatherings that would be put together by the
17 Republican National Committee, but I'm sure that
18 Republican state committees are exchanging thoughts
19 and concerns with regards to the voter registration
20 fraud.

21 Q. In the paragraph above it it says, "In
22 addition to Wisconsin, a battleground state,

1 Republicans are recruiting poll monitors in
2 Kentucky, which looks t be safely in Mr. Bush's
3 column, and battlegrounds Ohio and Minnsota."

4 Is the Republican National Committee
5 involved in recruiting or training poll monitors?

6 A. Is a poll monitor the same as a poll
7 watcher?

8 Q. Let's -- let me change the question --

9 A. Okay.

10 Q. -- and ask, break that apart.

11 A. Okay.

12 Q. And ask whether the RNC is involved in
13 training poll watchers?

14 A. We give out -- we have a Poll Watcher
15 2004 Manual that has been distributed to the
16 Republican National Committee members, state
17 chairmen, national committeeman and woman in each
18 of the states, in addition to the executive
19 directors and legal counsels. And in that there
20 are specific job descriptions for poll watchers.

21 In addition, in that manual you'll find
22 poll watcher certificates and information with

1 regards to various types of voting machines,
2 various problems that might or might not arise.
3 And we have widespread distributed that, widely
4 spread distributed it.

5 Q. And in addition to distributing these
6 materials you've just described for poll watchers,
7 does the RNC also hold conference calls for
8 different parties around the country regarding the
9 issue of recruiting and training, recruiting or
10 training poll watchers?

11 MR. BURCHFIELD: Object to form.

12 THE WITNESS: We have conference calls to
13 discussion -- with discussions on election law,
14 election activities and HAVA.

15 BY MR. NIELDS:

16 Q. And do those cover poll watchers?

17 A. I personally have not been on any of the
18 calls, so I don't know that I could say that poll
19 watchers are discussed or not discussed. As I
20 said, the manual lays out specifics.

21 MR. NIELDS: Document 15. I'm sorry,
22 when I first start off with document 15, I'm

1 talking to my partner, because she's got them
2 marked that way to pull out.

3 THE WITNESS: That's okay.

4 MR. NIELDS: I will later state the
5 exhibit number, which is coming right now. I'd
6 like this to be marked Cino Exhibit 3.

7 (Exhibit 3
8 marked for identification.)

9 BY MR. NIELDS:

10 Q. This again is a newspaper article in the
11 Palm Beach post, titled "GOP Charges Voter Fraud in
12 Ohio." And it begins, "Republican National
13 Committee Chairman Ed Gillespie on Tuesday joined
14 Ohio Republican Party Chairman Bob Bennett in
15 launching a media campaign to counter what they
16 call widespread voter registration fraud in nine
17 Ohio counties." I think you've already answered a
18 question about that quote.

19 Down toward the middle it said, "Bennett
20 said the state Republican Party this week will take
21 out a full-page ad in some Ohio newspapers urging
22 residents to report voter fraud suspicions to local

1 county boards of elections."

2 Do you know if that subject was discussed
3 by anyone from the RNC with anyone from the Ohio
4 Republican Party?

5 A. I believe that our regional political
6 director was aware that this was going to happen.

7 Q. Do you know, other than-- how did he
8 become aware?

9 MR. BURCHFIELD: You said "that subject."
10 You're talking about the fullpage ad that's
11 referred to there?

12 BY MR. NIELDS:

13 Q. Yes.

14 A. I'm sorry, that's what I was referring
15 to.

16 Regional political director, that's one
17 of his primary states, and has probably spent the
18 last month in that state.

19 Q. In Ohio?

20 A. Yes.

21 Q. And do you know if he discussed this,
22 this plan, with anyone in the Ohio Republican

1 Party?

2 MR. BURCHFIELD: Object to form.

3 THE WITNESS: He was aware of it. I
4 don't know that he-- he was aware that they were
5 going to do it or had talked about it. I don't
6 even know if they did end up doing it. But I can't
7 say that he was involved in the-- he was not
8 involved in the planning of this particular ad.

9 BY MR. NIELDS:

10 Q. What is his name?

11 A. David James.

12 Q. Okay. And I-- your last answer was
13 unclear to me. I apologize, maybe it's clear on
14 the record.

15 But are you saying that you can't say
16 whether or not he was involved in the planning?

17 A. No, I would say-- yes, I would say that
18 I can't -- I can't say that he was or wasn't
19 involved in the planning. My assumption is he was
20 aware of this particular ad based on the fact that
21 he also attended this press conference.

22 MR. NIELDS: Document 16. I'd like this

1 marked Exhibit 4.

2 (Exhibit 4

3 marked for identification.)

4 BY MR. NIELDS:

5 Q. I put in front of you a document marked
6 Exhibit 4. It's an article from The Washington
7 Post, headlined "Some Fear Ohio Will Be Florida of
8 2004."

9 Have you seen this before?

10 A. Yes, I have.

11 Q. And if you look over at the second page,
12 about a little more than a third of the way down
13 the page there's an a paragraph that begins,
14 "Republicans have pointed to what they contend is
15 widespread evidence of fraud in voter registration.
16 Making the rounds on the Sunday talk shows, for
17 instance, Republican National Committee Chairman Ed
18 Gillespie pointed out that in Franklin County, the
19 latest census shows there are more registered
20 voters than there are ageeligible residents."

21 Do you see that?

22 A. Yes, I do.

1 Q. And did he say that?

2 A. I can't confirm that that was said.

3 Q. Do you know if he learned that?

4 A. No, I don't.

5 Q. Do you know how he learned it, if he did?

6 (Ms. Browne left the room.)

7 THE WITNESS: From-- probably from
8 research that had been done, although I can't
9 attest to that.

10 BY MR. NIELDS:

11 Q. Research that had been done at the RNC?

12 A. Well, if this is in fact something that's
13 been printed, I would assume that it's widely known
14 in Franklin County, as well as Ohio. But that's my
15 assumption.

16 Q. Okay. So you don't know whether there
17 was research done on this at the RNC or not?

18 A. No. I mean I'm going by what's been
19 reported here.

20 MR. NIELDS: Okay. Let's look at Exhibit
21 17. Did I call this Exhibit 17? Document 17,
22 sorry. We're going to mark it as Exhibit 5.

1 (Exhibit 5
2 marked for identification.)

3 BY MR. NIELDS:

4 Q. This is another article from The
5 Washington Post, titled "Ohio GOP Challenges 35,000
6 Voters." It's dated Saturday, October 23rd, 2004.

7 Have you seen this before?

8 A. I have not seen this version, no.

9 Q. You want to read it?

10 A. Yes. Thank you.

11 (Pause in the proceedings.)

12 BY MR. NIELDS:

13 Q. Have you read it?

14 A. Yes.

15 Q. This article starts off, "The Ohio
16 Republican Party challenged the eligibility of
17 35,000 newly registered voters yesterday, an action
18 that party officials said was unprecedented but
19 necessary to prevent election fraud in a state
20 where polls show President Bush and John F. Kerry
21 in a statistical tie." It goes on to say, "Most of
22 the 35,000 voters live in urban, Democratic areas,

1 party spokesman Jason Mauk said."

2 First of all, who is Jason Mauk?

3 A. I don't know.

4 Q. Is he an RNC person?

5 A. He is not an RNC person. He very well--
6 I don't know.

7 Q. You don't know. Okay.

8 A. He's not an RNC person.

9 Q. Then it goes on, "Local party officials,
10 joined by Republican National Committee Chairman Ed
11 Gillespie at a news conference, said the voters
12 were mainly registered by 'shadowy'
13 Democratic-leaning groups and were chosen after the
14 GOP sent them mail that was returned as
15 undeliverable."

16 Is that a true statement to your
17 knowledge?

18 MR. BURCHFIELD: Object to form.

19 THE WITNESS: Well, the shadowy
20 Democratic-leaning groups is true, with regards to
21 two in particular, ACORN and ACT, who have, it has
22 been widely publicized, have been turning in

1 fraudulent voter registrations.

2 And the state party had sent a mailing in
3 five counties.

4 BY MR. NIELDS:

5 Q. All right. How about, first of all, was
6 Chairman Ed Gillespie present at this conference,
7 press conference?

8 A. If this is the news conference that I
9 believe was October 19th-- I'm sorry, 20th, yes.
10 This is dated the 23rd, so I would have no way of
11 knowing. He was at a press conference with Bob
12 Bennett on the 20th of October.

13 Q. And were the 35,000 voters chosen after
14 the GOP sent them mail that was returned as
15 undeliverable?

16 A. I'm sorry, I don't understand. 35,000
17 voters?

18 Q. Yes.

19 A. Could you reask your question? I'm
20 sorry.

21 Q. Yes. The second paragraph, which I think
22 I read in its entirety but now I'm going to read a

1 selected portion of, it says, "Most of the 35,000
2 voters live in urban, Democratic areas." "Local
3 party officials, joined by Republican National
4 Committee Chairman Ed Gillespie... said the voters
5 were mainly registered by 'shadowy'
6 Democratic-leaning groups and were chosen after the
7 GOP sent them mail that was returned as
8 undeliverable."

9 Is that a true statement?

10 MR. BURCHFIELD: Object to form.

11 THE WITNESS: Not only did the state, the
12 Ohio state party send out a mailing, but the
13 boards -- Ohio Board of Election sent out a
14 mailing. So I am not sure. I guess it would be
15 after -- the 35,000 came after the both mailings.

16 BY MR. NIELDS:

17 Q. So it's true?

18 A. Yes.

19 Q. And what conversations did Mr. Gillespie
20 have with Ohio state party officials about this?

21 A. Ed was with Chairman Bennett, was
22 informed of the voter fraud that had been found in

1 Ohio. Again, it had been widely publicized in
2 newspapers for the past week, so he was informed of
3 some of the specifics with regards to the voter
4 fraud that was happening in the state of Ohio.
5 Specifically, the registration of fake names, Dick
6 Tracy and Mary Poppins, and a gentleman who was
7 handing in multiple registrations and was paid in
8 crack cocaine --

9 Q. And how do you --

10 A. -- for those registrations.

11 Q. How do you know this?

12 A. I discussed this with Ed.

13 Q. When?

14 A. I discussed it today with Ed and his
15 conversations and meeting with the state party
16 chairman. He'd gone up there to do a dinner,
17 Hamilton town -- county dinner, to thank some of
18 our volunteers. And then was with Mr. Bennett when
19 Mr. Bennett announced voter fraud at a press
20 conference on October 20th.

21 Q. What other conversations or what else was
22 said during that conversation?

1 A. Chairman Gillespie expressed concern over
2 the --

3 MR. BURCHFIELD: Pardon me. Which
4 conversation are you referring to?

5 MR. NIELDS: Whichever conversation she
6 just described. She described a conversation in
7 which Mr. Gillespie was informed of certain things.

8 MR. BURCHFIELD: Okay, all right. That's
9 what I -- that helps to clarify.

10 THE WITNESS: Chairman Gillespie was
11 concerned with regards to the voter fraud, and once
12 again expressed the intentions of the Republican
13 party to make sure that all eligible legal voters
14 had the ability to vote. And again challenged the
15 Democrats with regards to a letter that he had sent
16 Terry McAuliffe back in June asking that a joint
17 program be done to try to stop any voter fraud.
18 And it would be done with the two parties jointly
19 together.

20 BY MR. NIELDS:

21 Q. And did they talk about what steps might
22 be taken to combat possible voter fraud by

1 involving these 35,000 names?

2 A. It was-- I believe it was at this
3 particular meeting or press conference where
4 chairman-- Chairman Bennett was deciding what
5 action he was going to be taking. So I can't say
6 that the specifics that were going to be-- the
7 specifics that were discussed, except that Chairman
8 Bennett was going to consider taking some action.

9 Q. And what did Mr. Gillespie say about
10 that?

11 A. Again, he knows, was concerned about the
12 voter fraud, but in no way, shape, or form, was
13 involved and was-- and he stated to the chairman,
14 as did our regional political director, due to the
15 fact that we signed a consent decree, that that is
16 something we could not be involved in.

17 Q. What was the "that"?

18 A. That whatever action Mr.-- Chairman
19 Bennett wanted to take, that was something we would
20 not be involved in.

21 Q. And what action did Mr.-- did
22 Mr. Bennett talk about any possible actions to

1 Mr. Gillespie?

2 A. He talked about possible challenge to the
3 fraudulent, with the fraudulent voter
4 registrations.

5 Q. And did Mr. Gillespie express any opinion
6 about whether that was a sensible thing to do?

7 A. Mr. Gillespie is very well-versed and
8 aware of our consent decree, and did not.

9 Q. And what other conversations did
10 Mr. Gillespie have with Mr. Bennett or anyone in
11 the Republican Party--

12 A. That's it.

13 Q. -- of Ohio about names on a returned
14 voter list?

15 A. That was it.

16 MR. NIELDS: Let's mark this-- number
17 18, let's mark it Exhibit 6.

18 (Exhibit 6
19 marked for identification.)

20 BY MR. NIELDS:

21 Q. I've put in front of you a document
22 marked Cino Exhibit 6. It's a news article from

1 The Columbus Dispatch, headed "Gop Challenges
2 Voters." It's dated Saturday, October 23rd, 2004.

3 Do you see that?

4 A. Yes, I do.

5 Q. It starts off, "In yet another sign of
6 how fiercely Ohio will be contested in the November
7 2nd presidential election, Republicans challenged
8 35,427 newly registered voters yesterday. And both
9 parties named thousands of people to be challengers
10 at the polls."

11 To your knowledge is that true?

12 A. Yes.

13 Q. At the bottom of the page it says, "The
14 challenges arose from a letter Bennett sent to all
15 voters who registered between January 1st and August
16 31. The letter, Bennett said, welcomed the new
17 voters 'to the process' and invited them to vote
18 Republican." And then it goes on, "Of the 232,000
19 letters mailed, about 30,000 were returned as
20 undeliverable either because the registrants didn't
21 exist, had moved or died, or because the letters
22 went to vacant houses or bogus addresses, Bennett

1 said."

2 Is that true?

3 MR. BURCHFIELD: Object to form and
4 foundation.

5 THE WITNESS: It's my understanding that
6 the challenges that Chairman Bennett made were
7 primarily from the mailing done by the Board of
8 Elections.

9 BY MR. NIELDS:

10 Q. And how do you know that?

11 A. It's been publicized and that -- that has
12 been publicized and that's what I was able to find
13 out in talking through the situation.

14 Q. From whom?

15 A. Our regional political director, David
16 James.

17 Q. That's what he told you?

18 A. Yes.

19 Q. And is that the-- do you have any other
20 source of information? What other basis do you
21 have for your belief that the list was made up
22 of -- from a mailing done by the Ohio Board of

1 Elections?

2 A. I believe that, and while I can't swear
3 to that, I believe that that had-- that has in
4 fact been in print, and I believe that is in my
5 declaration.

6 Q. Okay. But what I'm trying to find out is
7 how did it get in your declaration?

8 A. Again, information from my regional
9 political director. And I believe that that
10 information has been in print, that the-- in fact
11 it has been in print with regards to the Ohio Board
12 of Elections that had done specific mailings to new
13 registered voters. It is something they
14 traditionally do in sending a voter packet out.

15 I apologize, I have read probably
16 thousands of articles on any given week, and I
17 can't pinpoint it, but I know that I have read that
18 also in newspapers and it has been reported.

19 Q. Okay. So you've said --

20 A. As a matter of fact, that has also been
21 on CNN where Bob Bennett as early as this week was
22 opposite the Democratic National state-- I'm

1 sorry, the Democratic state chairman, and went back
2 and forth with regards to this very subject. So it
3 has also not only been in print, it has been on
4 cable TV.

5 Q. And when was that?

6 A. Sometime this week. The days are a blur
7 as we get closer to the election.

8 Q. Okay. So your bases for believing that
9 the 35,000 challenged list was made up from based
10 on a mailing sent out by the state of Ohio, is a
11 CNN -- an appearance on CNN by Bennett; am I
12 correct so far?

13 MR. BURCHFIELD: Object to form I
14 believe that misstates the prior.

15 THE WITNESS: Yes, my basis of this is
16 that it has been reported, widely reported, that
17 the Board of Elections did a mailing and tens of
18 thousands of returns came back. And it has been
19 reported in newspapers and on TV.

20 BY MR. NIELDS:

21 Q. And did those newspapers and TV reports
22 say that that was the basis upon which the Ohio

1 Republican Party compiled their challenge list?

2 MR. BURCHFIELD: Object to form.

3 THE WITNESS: I believe that the news
4 conference that Chairman Bennett had earlier this
5 week opposite the Democratic state party chairman
6 mentioned the mailing. And that was-- that was
7 the returns from that specific mailing to new
8 registrants that was sent out.

9 BY MR. NIELDS:

10 Q. But you would agree, would you not, that
11 the exhibit in front of you says at the bottom,
12 "The challenges arose from a letter Bennett sent to
13 all voters who registered between January 1 and
14 August 31. The letter, Bennett said, welcomed the
15 new voters 'to the process' and invited them to
16 vote Republican." Then it goes on, "Of the 232,000
17 letters mailed, about 30,000 were returned as
18 undeliverable either because the registrants didn't
19 exist, had moved or died, or because the letters
20 went to vacant houses or bogus addresses, Bennett
21 said." Correct?

22 A. That's what this article says.

1 Q. Okay. You've given another basis for
2 believing that it was done based on the state of
3 Ohio's mailings, and that was your regional
4 director --

5 A. Yes.

6 Q. -- correct? And how did your regional
7 director know?

8 A. Again, the regional political director is
9 in the state and is involved in the campaign and is
10 made aware of this mailing that the state party did
11 and was made aware of the mailing that the board,
12 Ohio Board of Elections did.

13 Q. And was he made aware also of the
14 challenge list that was made up by the Ohio
15 Republican Party?

16 A. He was knowledgeable that that was one of
17 the avenue -- that was one of the avenues, that the
18 state party would be considering a challenge list
19 based on these two mailings.

20 MR. NIELDS: Like this to be marked
21 Exhibit 7.

22 (Exhibit 7

1 marked for identification)

2 BY MR. NIELDS:

3 Q. My first question, this is-- I've put in
4 front of you a document marked Cino Exhibit 7.

5 Have you seen this before?

6 A. No.

7 Q. It purports to be a press release from
8 the Ohio Republican Party, correct?

9 A. Yes, it does.

10 Q. And it says-- dated Friday, October
11 22nd, 2004. I'm sorry, you said you haven't seen
12 it before and I haven't let you read it.

13 A. No, no, I'm sorry.

14 Q. Have you had a chance to look at it?

15 A. Yes, sir.

16 Q. It starts -- well, it's titled "Ohio GOP
17 Continues Effort to Combat Election Fraud.
18 Challenges Filed to Possible Fraudulent
19 Registrations in Multiple Counties." And then the
20 first paragraph reads, "The Ohio Republican Party
21 filed official challenges today to approximately
22 35,000 new registrants in 65 counties where mail

1 was returned as undeliverable by U.S. Postal
2 Service authorities." And then if you skip down
3 three paragraphs, it says, "Bennett was joined at a
4 news conference earlier this week by Republican
5 National Committee Chairman Ed Gillespie, where he
6 displayed thousands of pieces of undeliverable mail
7 to newly-registered voters." The mail was returned
8 to the party at an un-- excuse me. "The mail was
9 returned to the party at an unprecedented rate,
10 three to ten times normal rates for new
11 registrants."

12 Do you know whether that is true?

13 A. I believe it is true. At this particular
14 news conference, Chairman Bennett used the returns
15 from his mailing.

16 Q. Did he mention any mailing by the state?

17 A. At this particular press conference, I
18 can't answer that.

19 Q. Now, in your declaration, and if you need
20 it -- well, do we have extra copies? I'll put that
21 in front of you.

22 MR. NIELDS: Do we need to mark this?

1 I'm happy to if you wish. Let's mark it.

2 MR. BURCHFIELD: Yeah, let's mark it.

3 MR. NIELDS: Let's mark it Exhibit 8.

4 (Exhibit 8

5 marked for identification.)

6 (Ms. Browne entered the room.)

7 BY MR. NIELDS:

8 Q. Okay. I put in front of you a document
9 marked Exhibit 1. Is that a declaration that you
10 prepared yesterday or the day before yesterday?

11 THE REPORTER: Excuse me, it's Exhibit 8.

12 MR. NIELDS: Did I forget to say Exhibit
13 8?

14 THE REPORTER: You said Exhibit 1.

15 BY MR. NIELDS:

16 Q. I'm sorry, Exhibit 8.

17 A. This is my declaration and prepared with
18 help from my counsels at the RNC.

19 Q. And is it accurate to the best of your
20 knowledge?

21 A. Yes, sir, to the best of my knowledge.

22 Q. I never questioned that it was when you

1 wrote it. I just wanted to make sure you hadn't
2 learned something since.

3 In the second paragraph you say, "Since
4 receiving the Democratic National Committee's
5 papers at approximately 7 p.m." Actually, that is
6 incorrect, isn't it? "My staff and I have
7 investigated the facts and circumstances upon which
8 the DNC's allegations are purportedly based."

9 You mean the Intervenor's papers, I take
10 it?

11 A. Yes.

12 Q. Okay. With that amendment, you say that
13 your staff and you have investigated the facts and
14 circumstances upon which the DNC's allegations are
15 purportedly based.

16 Can you describe what you did in your
17 investigation?

18 A. Yes. Upon receiving this, I first
19 consulted with our legal counsel at the Republican
20 National Committee, our legal team, and discussed
21 what had been sent to us. In addition, with
22 regards to the investigation of the facts, I have

1 talked with Chairman Gillespie, I've talked with
2 our national political director.

3 Q. Who's that?

4 A. Blaise Hazelwood.

5 Q. I'm sorry, again?

6 A. I'm sorry, Blaise Hazelwood.

7 Q. Okay.

8 A. I've talked with David James, our
9 regional political director. These are the people
10 that would be the ones that would be knowledgeable
11 of this situation.

12 Q. And how did you reach that conclusion?

13 A. Which conclusion?

14 Q. That they would be the ones who would be
15 knowledgeable about this situation.

16 A. Well, it-- it dealt with voter fraud,
17 it's a political situation. So Blaise Hazelwood
18 would be a natural person as she oversees our
19 political division. The regional political
20 director is in the state and is knowledgeable of
21 much of what is going on. And Ed Gillespie had
22 attended a press conference with Bob Bennett on the

1 20th of this month.

2 Q. Did you talk to anybody else?

3 A. Our legal counsel at the RNC, and
4 communications director.

5 Q. Who's that?

6 A. Jim Dyke.

7 Q. Why did you talk to him?

8 A. I asked Jim to pull up sme information
9 with regards to the press conference that the
10 chairman had had with the state party, Chairman
11 Bennett. And also asked with regards to other
12 inquiries that the communications dpartment was
13 getting in addition to some of the other facts that
14 had been widely publicized with regards to voter
15 fraud.

16 Q. When did you have these conversations?

17 A. Today is Friday. Wednesday evening,
18 yesterday.

19 Q. Wait a minute, let's--

20 A. I'm sorry.

21 Q. Who did you talk to on Wednesday evening?

22 A. Wednesday evening, primarily to my legal

1 counsel at the committee.

2 Q. Okay. And then you said also Thursday?

3 A. Yes, I'm sorry, yesterday was Thursday.
4 Thursday.

5 Q. And who did you talk to yesterday?

6 A. Communications director.

7 Q. That's Mr. Dyke?

8 A. Yes. And, I'm sorry, on Friday evening,
9 Chairman Gillespie.

10 Q. When?

11 A. I'm sorry, Wednesday evening, sorry.
12 It's all a blur. Wednesday evening, in addition to
13 the attorneys I spoke with Chairman Gillespie.

14 Q. Okay.

15 A. Thursday I spent most of my day looking
16 at this and the other documents that you all had
17 sent over. And again talking with my attorneys,
18 and Mr. Gillespie.

19 Q. You talked to Mr. Gillespie again?

20 A. On Thursday.

21 Q. Again on Thursday?

22 A. Yes, sir.

1 Q. What time?

2 A. You know, I talked to him several times a
3 day, so I -- he's traveling and -- morning,
4 afternoon, and late evening.

5 Q. And did you talk to him about -- ask him
6 questions related to your investigation for the
7 purpose of preparing your --

8 A. Yesterday's conversations --

9 Q. I need to finish. For the purpose of
10 preparing your declaration?

11 A. Why don't you start over again?

12 Q. Yeah, okay.

13 A. I'm getting tired.

14 Q. You had one conversation with
15 Mr. Gillespie on Wednesday evening, correct?

16 A. Yes, sir.

17 Q. And that was on the subject of the
18 investigation you did to prepare your declaration,
19 correct?

20 A. No. That was on Wednesday to inform him
21 that we had received whatever the legal name is for
22 whatever we received.

1 MR. BURCHFIELD: The love letter.

2 THE WITNESS: The love letter from--

3 BY MR. NIELDS:

4 Q. Okay. So you were informing him during
5 that conversation?

6 A. Yes.

7 Q. Okay. Then you had conversations with
8 him on Thursday, correct?

9 A. Yes.

10 Q. And you think it was three?

11 A. It was probably early mornning, midday,
12 and late evening.

13 (Jason Levine entered the room.)

14 BY MR. NIELDS:

15 Q. Early evening?

16 A. No, late evening.

17 Q. Late evening.

18 A. It's been a very late night.

19 (Mr. Duncan left the room.)

20 BY MR. NIELDS:

21 Q. Let's take the early morning
22 conversation.

1 A. I can't break those down for you. I can
2 tell you what we specifically talked about, but
3 it's been a 48-hour process. Specifically--

4 Q. Well, I haven't asked you a question yet
5 about it.

6 A. Okay. Go ahead.

7 Q. I'm going to take the first, the early
8 morning conversation.

9 A. Okay.

10 Q. How long did it last?

11 A. I don't know.

12 Q. Approximately.

13 A. 15 minutes.

14 Q. Did you talk to him about your
15 investigation to prepare your declaration then?

16 A. It was myself and the attorneys, and we
17 talked about how we were going to proceed.

18 Q. But did you ask him questions about what
19 happened during that conversation?

20 A. No.

21 (Mr. Duncan entered the room.)

22 BY MR. NIELDS:

1 Q. Okay. Then you said you had a
2 conversation midday, correct?

3 A. Yes.

4 Q. How long did that last?

5 A. Five minutes.

6 Q. And during that did you ask him questions
7 in order to inform yourself to prepare your
8 declaration?

9 A. No. It was an update as to how we were
10 proceeding.

11 Q. Okay. And then last-- late yesterday
12 p.m., you had a third conversation, correct?

13 A. Yes.

14 Q. And how long did that last?

15 A. Approximately 10 minutes, 15 minutes.

16 Q. And during that conversation did you ask
17 him questions on the subject of your investigation?

18 A. Not specifically. Again, updating him
19 how we were going to proceed.

20 Q. Okay. And have you had a conversation
21 with him since?

22 A. Yes.

1 Q. When?

2 A. Today is Friday, it was today.

3 Q. Okay. And when?

4 A. Early morning.

5 Q. How long did it last?

6 A. Approximately 20 minutes.

7 Q. And did you ask him questions about the
8 subject matter of your investigation --

9 A. Yes.

10 Q. -- then? And did the entire conversation
11 involve that process?

12 A. I spent a couple of minutes on how we
13 were proceeding and then went to specific
14 questions.

15 Q. Okay. I'm going to come back to that
16 conversation. But I take it that conversation
17 occurred after you prepared your declaration?

18 A. Yes.

19 Q. All right.

20 MR. BURCHFIELD: When you get to a
21 good -- when you get to a good point, if we could
22 take a break, that would be great.

1 MR. NIELDS: I will.

2 MR. BURCHFIELD: I don't want to
3 interrupt your flow, but when you get--

4 MR. NIELDS: When I get to a stoppin
5 point, which will be fairly soon.

6 MR. BURCHFIELD: Okay, great.

7 BY MR. NIELDS:

8 Q. When did you talk with Blaise Hazelwood?

9 A. I spoke with Blaise today and I spoke
10 with her briefly on Wednesday.

11 Q. And what was the nature of your
12 conversation with her on Wednesday?

13 A. Just to inform her that of the suit.

14 Q. Did you ask her any questions to get her
15 version of facts during that conversation on
16 Wednesday?

17 A. I did not.

18 Q. When did you talk to David James?

19 A. I spoke to David James today.

20 Q. And not earlier?

21 A. No.

22 Q. All right. Then on what information did

1 you base what you said in your declaration?

2 A. The information in the declaration was
3 from meetings that I have been in and news clips
4 and various things that may have come across my
5 desk.

6 Q. What meetings?

7 A. Meetings with regards to, for example, we
8 discussed the chairman's travel every week and one
9 of the topics was his trip to Ohio on October 19th
10 and October 20th and what we were planning to do at
11 that specific press conference. So I was aware
12 that we had participated in a press conference with
13 Chairman Bennett.

14 Q. Anything else -- and did you -- during
15 that meeting did you learn any other information
16 that supported your declaration?

17 A. What meeting?

18 Q. Well, you said that you based your
19 declaration in part on meetings. And then when I
20 asked --

21 A. Strategy meeting.

22 Q. Strategy meeting?

1 A. Jim had pulled up information for me with
2 regards to some press clips, some of which were
3 included here.

4 Q. Any other meetings that informed your
5 declaration?

6 A. We have senior staff meetings three times
7 a week. We have political meetings almost every
8 day. And I'm in touch with the field people
9 several times a week. So this head has a lot of
10 information in it.

11 Q. And these were meetings and conferences
12 you had had at an earlier point in time, correct?

13 A. Sure, throughout the-- well, throughout
14 the last 18 months that I've been at the committee.

15 Q. When did you complete the preparation of
16 your declaration?

17 A. Very quickly, yesterday, I believe it
18 was -- Bobby was going to court. We received it on
19 Wednesday night, and spent a fair amount of time.

20 Q. Sure, sure, I understand. But I'd like
21 to pin down a time for the deposition.

22 A. I'm going to say between 1:30 and 2:00.

1 I believe, best of my knowledge, that this got to
2 Mr. Burchfield just as he was going to court.

3 Q. I don't want to be repetitive, but I want
4 to make sure I understand.

5 A. Sure.

6 Q. Prior to that time you had not asked
7 Mr. Gillespie questions about what had happened,
8 and you hadn't asked Blaise Hazelwood questions
9 about what had happened, and you hadn't yet talked
10 to David James.

11 Is that true?

12 A. No. I had talked with Blaise to inform
13 her on Wednesday that I received this. I was
14 knowledgeable of the press conference that Ed had
15 where they talked about voter fraud.

16 Much of what is in here is with the
17 assistance from my legal counsel at the committee
18 and just my knowledge of things that-- political
19 things that go on.

20 Q. So the declaration was based in part on
21 information transmitted by your lawyer to you?

22 A. Yes, and some from me to them.

1 Q. Okay. And did you-- did you study any
2 documents before you prepared this delaration?

3 A. I looked at various press clips and the
4 suit that you had all sent over.

5 Q. Any other documents?

6 A. No.

7 MR. NIELDS: All right. Le's take a
8 break now.

9 MR. BURCHFIELD: Ten minutes?

10 MR. NIELDS: Ten minutes is fine.

11 (Recess taken at 6:39 p.m.)

12 (Deposition resumed at 6:48 p.m.)

13 (Mr. Levine is not present.)

14 BY MR. NIELDS:

15 Q. Could you turn to the second page of your
16 declaration, paragraph 4, where it says, "On or
17 about August 10, 2004, the Republican National
18 Committee mailed a letter welcoming all
19 newly-registered voters in Cuyahoga County, Ohio,
20 to the political process, and encouraging them to
21 support the Republican ticket."

22 Do you see that?

1 A. Yes, I do.

2 Q. Where did you get the list?

3 A. The list was gotten from the Cuyahoga
4 County Board of Elections of newly registered
5 voters.

6 Q. Who got it?

7 A. One of the folks in our department. I
8 can't say. I'm sure it was someone in our
9 political division, but I can't tell you
10 specifically who the person was. Likely to have
11 been someone in our network services that does
12 computer, our computer systems.

13 Q. Well, I'm more interested in what you've
14 heard, learned, or know, rather than what you think
15 is likely.

16 A. Okay. I can't answer that question.

17 Q. Okay. And was it -- was it somebody with
18 the Ohio Republican Committee that got it?

19 A. Best of my knowledge, it was someone from
20 the Republican National Committee.

21 Q. Okay. And when did you get it?

22 A. That, I don't know. I can't give you a

1 specific date.

2 Q. Okay. Did you get it from any other
3 counties in Ohio?

4 A. We get lists all the time from counties,
5 from states, board of elections, and constantly
6 updating our voter files. So I am sure that we
7 have gotten -- I would be almost sure that we have
8 gotten other lists of new registered voters to
9 update our Ohio file.

10 Q. Okay. And who did the mailing at the
11 RNC?

12 A. We used a vendor.

13 Q. And who contacted the vendor?

14 A. Someone from our political division.

15 Q. But you don't know who?

16 A. I can't say, no.

17 Q. Were similar mailings done based on
18 registration lists, lists of newly registered
19 voters, in other states?

20 MR. BURCHFIELD: Object. Beyond the
21 scope of the --

22 MR. NIELS: It's in your brief.

1 MR. BURCHFIELD: But it's beyond the
2 scope of this deposition. I'm going to let her
3 answer it, though.

4 THE WITNESS: Yes.

5 BY MR. NIELDS:

6 Q. Okay. All 50 states?

7 A. No.

8 Q. How many?

9 MR. BURCHFIELD: Same objection.

10 BY MR. NIELDS:

11 Q. Go ahead.

12 A. I would say, depending on at what point
13 we were in this campaign, as many as 20, or 17,
14 battleground states.

15 Q. Now, who developed the list of
16 envelope -- of mailings that were returned
17 undelivered?

18 MR. BURCHFIELD: Object to form.

19 THE WITNESS: If I'm understanding your
20 question, the list was gotten from the Cuyahoga
21 Board of Elections of newlyregistered voters.

22 BY MR. NIELDS:

1 Q. Okay. My question isn't clear.

2 That was the list you used to do the
3 mailing, correct?

4 A. Yes.

5 Q. And you mailed forth 49,552 letters,
6 correct?

7 A. Yes.

8 Q. And 3,353 were returned as undeliverable,
9 correct?

10 A. That is true.

11 Q. Okay. And did somebody make a list of
12 those?

13 A. Of the unreturned?

14 Q. Yes.

15 A. Yes.

16 Q. Who?

17 A. It was a list that was made by the Ohio
18 Republican Party. They received the returns.

19 Q. So you did the mailings and they received
20 the returns?

21 A. Yes. The return address was to the Ohio
22 Republican Party.

1 Q. And did they-- did they send a copy of
2 the list to you?

3 A. Yes.

4 Q. Where is it?

5 A. I don't know.

6 Q. Do you--

7 A. I'm sure it's in our -- well, I'm not
8 going to speculate.

9 Q. Is it in the possession of the RNC?

10 A. Yes.

11 MR. NIELDS: We'd like to get it.

12 MR. BURCHFIELD: You may have gotten it
13 today.

14 MR. NIELDS: Well, I got a list we'll
15 talk about in a minute. It doesn't have this
16 number of names on it, though.

17 MR. BURCHFIELD: Let me make inquiry. I
18 was under the impression that was the list, but
19 I'll inquire.

20 BY MR. NIELDS:

21 Q. Okay. So both you and the Republican
22 Party of Ohio had this list of mail returned

1 undelivered, correct?

2 A. Yes.

3 Q. Why was the list made?

4 A. Excuse me?

5 Q. Why was the list made?

6 A. To keep track of voter-- to keep track
7 of returned undeliverable mail.

8 Q. And why did you want to keep track of
9 returned undeliverable mail?

10 A. We do data collection and we store this
11 information.

12 Q. For what purpose?

13 A. Variety of different reasons.

14 Q. Hmmm?

15 A. Variety of different reasons.

16 Q. Okay. Tell me what the variety of
17 different reasons were.

18 A. One would be for public relations.

19 Q. And how would it help your public
20 relations to have a list of undeliverable mail?

21 A. Looking at the list and determining if
22 there were duplicates or if there were forge-- if

1 there were returns that may have come-- a lot of
2 returns from one particular address maybe that
3 didn't exist.

4 Q. So you were interested in whether people
5 lived at or were registering from places that
6 didn't exist?

7 A. That was part of it.

8 Q. Okay. What other reasons?

9 A. Okay. The second reason, as has been
10 reported, the Democrats have stated time and time
11 again that they intend on challenging the results
12 of this election. This is a battleground state, a
13 state that is very, very competitive, and this
14 information will be stored and possibly used later.

15 Q. For what purpose?

16 A. If the results of this election were to
17 be challenged.

18 Q. And how would you use it if -- in a
19 challenge by you, by the Republican National
20 Committee --

21 A. Well, I would assume--

22 Q. -- or by the Democrats?

1 A. -- that the Democrats would be
2 challenging the election. We're going to win.

3 Q. And so in what way would this list help
4 you if the Democrats challenged the election?

5 A. This list could point out duplicate
6 registrations. This list, as I said earlier, would
7 be able to point out many residents listed to one
8 address that perhaps didn't exist.

9 Q. And how would that help you?

10 A. If there was a question in perhaps the
11 vote count in that particular county.

12 Q. In other words, you might argue that ~~one~~
13 of the votes cast for the Democrats had been
14 fraudulently cast?

15 A. Yes.

16 Q. Okay. Now, was any analysis done of this
17 list?

18 A. I'm not ~~sure~~. Can you be more specific,
19 analysis?

20 Q. Well, what was done with the list at the
21 RNC when you got it?

22 A. Of undeliverables?

1 Q. Of undeliverables.

2 A. We cataloged it and stored it.

3 Q. Was it discussed within the RNC by
4 anybody?

5 A. We discussed the percentage of returns
6 based on the size of the counties and based on the
7 size of the newly registered.

8 Q. Well, you don't mean counties, do you?
9 There was only one county.

10 A. I'm sorry, based on the county and the
11 newly registered in that particular county.

12 Q. Well, there were 3,353.

13 A. Correct.

14 Q. Correct?

15 A. Yes.

16 Q. Did you discuss within the RNC whether
17 this indicated that maybe some registrations were
18 fraudulent?

19 A. We observed from the returns that there
20 were in fact several that were duplicates, that
21 were registered-- several that were an ordinary
22 amount registered to one particular address.

1 Q. And who engaged in those discussions?

2 A. Myself and Blaise Hazelwood. Our
3 communications person.

4 Q. Who?

5 A. Jim Dyke.

6 Q. Anyone else?

7 A. At various times we had our counsel
8 present, our legal counsel present.

9 Q. And?

10 A. Their names?

11 Q. Oh, sure, I'll take their names.

12 A. I'm sorry, Jill Holtzman, Mike Duncan.

13 Q. And was there discussion as to whether
14 some of these 3,353 were potentially fraudulent
15 voters?

16 A. There was a concern.

17 Q. And was there a discussion about what
18 might be done?

19 A. No, there was not.

20 Q. No discussion of what might be done?

21 A. We would be collecting the data and unde
22 the consent decree we knew that we couldn't do much

1 with this list.

2 Q. Well, that wasn't--

3 A. That's why we had legal counsel there.

4 Q. That wasn't exactly my question.

5 My question was, was there discussion of
6 what might be done?

7 A. And I believe I answered the question
8 earlier when I said potential public relations.
9 And if in fact the Democrats who were out there
10 already saying that they were going to contest this
11 election, this would be information that might be
12 used.

13 MR NIELDS: Well, let's take a look at
14 the list, or a list. Everybody have copies of
15 this? Maybe I do. No, I don't.

16 Let's mark these Exhibits, what are you
17 at, 8? 9A and B.

18 (Exhibits 9A and B
19 marked for identification.)

20 BY MR. NIELDS:

21 Q. Okay. I'm putting a document in front of
22 you marked Cino Exhibit A. What is it?

1 A. It's a Cuyahoga County list.

2 Q. List of--

3 A. I believe these are the names of the
4 returned.

5 Q. This is a list of newlyregistered voters
6 to whom mail was sent and the mail returned; is
7 that what you're saying?

8 A. Well, I can't tell you if this is-- yes,
9 it appears that this is that list, yes.

10 Q. Okay. It's 31 pages long, and you can
11 count if you wish, but my count is there's--

12 A. I'll believe you.

13 Q. Pardon?

14 A. I'll believe you.

15 Q. There's a little over 30 lines on each
16 page. My math, if you multiply 31 by a number in
17 the low 30s, you get to a little over 900. And so
18 I renew my request for the full list.

19 MR. BURCHFIELD: I'll inquire.

20 MR. NIELDS: Thank you.

21 BY MR. NIELDS:

22 Q. The cover page has written on it in

1 large, in the copy I've got, black writing, it
2 looks like almost magic marker type writing, "OH,
3 highly suspicious."

4 Who put that on there?

5 A. I'm not sure.

6 Q. What does it mean?

7 A. I believe what it means is that these
8 names, based on for example the number at this
9 first address, four people at this first address
10 with different last names, would be suspicious,
11 that they were all at one address and they had
12 different last names. So people that -- perhaps
13 multiple registers and people who lived at more--
14 unrelated people that lived at one address.

15 Q. Suspicious, what you were suspicious of
16 here is fraud, correct?

17 A. Suspicious of voter registration
18 irregularity.

19 Q. Well, are you afraid of the word "fraud"?

20 A. No.

21 Q. Well, did you-- were you suspicious of
22 fraud here?

1 A. Yes, we were suspicious of fraud.

2 Q. Okay. And then let's turn to page 22.

3 Okay?

4 A. Yes.

5 Q. Do you see that page?

6 A. Yes.

7 Q. It's got some handwriting on the
8 right-hand side, correct?

9 A. Yes, it does.

10 Q. Who put that there?

11 A. I would not be able to tell you that.

12 Q. What was the function of the person who
13 put that there?

14 A. To review the list for voter
15 irregularities.

16 Q. You don't like the word "fraud"?

17 A. Not really.

18 Q. Only in press conferences. Withdraw the
19 question.

20 A. Thank you.

21 MR. BURCHFIELD: Was it a question?

22 BY MR. NIELDS:

1 Q. What department was the person in who
2 wrote these handwritten notes in the right-hand
3 column?

4 A. This was probably-- the best of my
5 knowledge, the research department.

6 Q. At the bottom it says "Evan, 8/26/04."

7 Do you know what that means?

8 A. I do not.

9 Q. Was there somebody in the research
10 department named Evan?

11 A. Our research department has probably got
12 40 people in it right now, and I would not be able
13 to answer that.

14 Q. Okay. You don't know if there's a person
15 named Evan?

16 A. I do not.

17 Q. And it says things like mistyped address,
18 no record found, doesn't look residential, looks
19 like parking lot, mostly commercial area, no
20 records, not likely?

21 A. Correct.

22 Q. What is the person-- what is the meaning

1 of those notes?

2 A. Again, these are the returns that we
3 would suspect voter irregularities.

4 Q. And what was -- how did you -- how did
5 you -- or how did the person who wrote these get
6 the information necessary to make these notes?

7 A. With regards to some of this information,
8 and I can't say which, variety of different ways.
9 Phone books were used. And in addition to that,
10 several research folks were in the field and
11 actually drove by some of these addresses to see if
12 there was a mistake and perhaps it was a residence,
13 or in fact that it was a park lot.

14 Q. And how do you know that?

15 A. I talk--

16 MR. BURCHFIELD: Object to fm.

17 You may answer.

18 THE WITNESS: Thanks. Through talking
19 with Blaise about --

20 BY MR. NIELDS:

21 Q. When?

22 A. -- results of the returns.

1 Q. When?

2 A. I'm afraid I couldn't give you a specific
3 date.

4 Q. But this is back in the August, September
5 time frame when this was done?

6 A. Roughly, but I can't be specific with
7 you.

8 Q. So you knew then that people at the RNC
9 were looking at this list and doing additional
10 investigation to inform themselves about whether
11 these were proper voters or not?

12 A. Yes.

13 Q. Up at the -- looking at the first page,
14 there's a line that says info key, colon, CF,
15 paren, couldn't find; VR, paren, verified
16 residential; P, photo; B, business; O, other.

17 A. Yes.

18 Q. What is -- what is that?

19 A. Exactly what it says. This is how we
20 cataloged. Couldn't find that particular address
21 or house. Verified the residence. If it was
22 perhaps suspect, a photo might have been taken. Or

1 it was B, a business.

2 Q. And where on this document do you use
3 these key words?

4 A. That, I can't tell you, because I've
5 never seen a completed list.

6 Q. But isn't it fair to say that whoever did
7 this -- well, did you participate in generating
8 this form?

9 A. I did not.

10 Q. Who did?

11 A. I would not be able to specifically say
12 that, who did, I don't know.

13 Q. Generally who, what department?

14 A. I would-- I would believe it would be
15 the political department.

16 Q. And do you know whether they developed
17 this key because they wanted to do investigation of
18 these voters, additional investigation of these
19 voters in order to determine whether they were
20 proper voters or not?

21 A. I'm sorry, could you ask that question
22 again?

1 MR. NIELDS: Read it back.

2 (The reporter read back as requested.)

3 THE WITNESS: I believe the keys were
4 developed to determine whether or not these voters
5 were irregular voters.

6 BY MR. NIELDS:

7 Q. Okay. And do you know whether additional
8 investigation was done on the challenge list that
9 was ultimately filed by the Ohio Republican Party?

10 A. I would not know that because they had
11 their own list.

12 Q. Let's go back to 9B. 9B-- well, strike
13 that.

14 It appears to be the same list with the
15 same names. Well, it's not exactly. Yes, it is,
16 excuse me. It appears to be the same list with the
17 same names. But with different handwritten notes
18 on the right-hand column.

19 And I'd like you to turn to page 23. I
20 apologize, because what I have done is I've--

21 A. Combined the two.

22 Q. I believe I've given you--

1 A. The same list. I'm sorry, there's two
2 lists in here.

3 MR NIELDS: I think I've given you-- I
4 think I've marked as Exhibit 9B more than one list.
5 Yes. I would like to break 9B apart and I'd like
6 to mark 9B1 pages that are Bates stamped RNC 00035
7 to RNC 00065.

8 (Exhibit 9B remarked
9 as Exhibit 9B1.)

10 MR. NIELDS: And then I'd like to mark as
11 Exhibit 9B2 a document marked RNC 00066 through RNC
12 00068.

13 (Exhibit 9B2
14 marked for identification.)

15 MR. NIELDS: And then I'd like to mark as
16 Exhibit 9B3 a document going from pages RNC 00069
17 to 00099.

18 (Exhibit 9B3
19 marked for identification.)

20 BY MR. NIELDS:

21 Q. Okay. Now I'm going to put back in front
22 of you Exhibit 9B1, 9B2, and 9B3.

1 A. Okay.

2 Q. And counsel can check me or the witness,
3 but 9B1 appears to be the same list as 9A, except
4 that it has different handwritten notes in the
5 margin. And if you look at page 23 and 24, for
6 example, you'll see some more handwritten notes in
7 the margin, correct?

8 A. Yes.

9 Q. Of a similar type to the notes on Exhibit
10 9B -- 9A, correct?

11 A. Yes.

12 Q. And if you look at Exhibit 9B3, it
13 appears to be a very similar list to 9A, but here
14 the info notes column has typewritten notations
15 instead of handwritten, correct?

16 A. Correct.

17 Q. Do you know who prepared Exhibit 9B3?

18 A. I do not.

19 Q. Let's take a look at 9B2. Have you seen
20 the documents that are in -- the three documents
21 that are in 9B2 before?

22 A. The first time this morning.

1 Q. And who prepared this?

2 A. I couldn't tell you.

3 Q. You didn't ask?

4 A. Did not ask.

5 Q. When did you first see 9A and 9B1 and
6 9B3?

7 A. Today.

8 Q. And did you ask any questions about these
9 documents?

10 A. No, I did not.

11 Q. So you don't-- you didn't talk to the
12 people who prepared them and you don't know why
13 they prepared them for sure?

14 A. I talked with my attorney and these were
15 records that we have in our building. And that is
16 what I believe they are.

17 Q. And that's all you know about them?

18 A. With regards to Cuyahoga County,
19 unreturned-- undeliverable mail.

20 Q. You mean you know that they had to do
21 with that?

22 A. Well, Cuyahoga County, mailing returned.

1 Q. And it had--

2 A. On 9B2.

3 Q. And it has returned, 2,943, correct?

4 A. Yes.

5 Q. And it says entered, 2,496, correct?

6 A. Yes, it does.

7 Q. And it says reviewed, 950?

8 A. Yes.

9 Q. Then it says suspicious, 50 to 80?

10 A. Yes.

11 Q. And then says highly suspicious, 10,

12 correct?

13 A. Yes.

14 Q. So of the 950 that were reviewed, 50 to

15 80 were suspicious and 10 were highly suspicious,

16 correct?

17 A. Highly--

18 MR. BURCHFIELD: Object.

19 THE WITNESS: I only know what's written

20 on this form. I don't know that for a fact.

21 BY MR. NIELDS:

22 Q. But that's what's written on the form,

1 correct?

2 A. That is what's written on the form.

3 Q. Do you know whether anybody at the
4 Republican Committee in Ohio or the Republican
5 National Committee tried to separate the suspicious
6 and highly suspicious from all the rest & the
7 returned address newly registrants when the
8 challenges were made, the 35,000 challenges were
9 made to newly-registered voters in Ohio?

10 I want to ask that question again because
11 it was a really bad question.

12 A. I'm sorry, I lost you. Sorry. I thought
13 it was just me.

14 Q. Okay. I'm moving forward. I'll come
15 back to these lists in a minute.

16 A. Okay, thank you.

17 Q. But I'm moving forward. I want to ask
18 you this question.

19 You're aware that challenges were made to
20 35,000, more or less, registrants in Ohio?

21 A. Yes, I am.

22 Q. Okay. And that that was based on--

1 according to your affidavit, that was based on
2 mailings that were made to new registrants by the
3 state of Ohio, of which some 35,000 were returned
4 undelivered?

5 A. That is correct, primarily from the
6 returns from the Ohio Board of Elections.

7 Q. And do you know whether before making the
8 challenges anybody went over that list to separate
9 out the highly suspicious and the suspicious from
10 all the rest of them?

11 A. I'm sorry, what list are you talking
12 about?

13 Q. The list of 35,000 that came back
14 undelivered, okay?

15 A. Yes.

16 Q. Do you know if anybody took that list and
17 tried to determine which of those were suspicious
18 or highly suspicious and which weren't?

19 A. Based on what? We're talking about two
20 different lists.

21 Q. All right. Let's go back to the
22 beginning. Okay.

1 A. Okay.

2 Q. We have here lists 9-- let's go back to
3 9A, correct?

4 A. Yes.

5 Q. And this is a list made up of returned
6 mail from a mailing that the RNC caused to be made
7 to newly-registered voters in Cuyahoga County?

8 A. Correct.

9 Q. And then I think we've established that
10 somebody at the RNC did some more work?

11 A. Research.

12 Q. More research to try to determine wheter
13 these were real buildings or not, whether these
14 were irregular voters or not, correct?

15 A. Correct.

16 Q. Okay. And they came up-- somebody came
17 up with a categorizing of these voters?

18 A. Correct.

19 (Ms. Browne left the room.)

20 BY MR. NIELDS:

21 Q. And they put 50 to 80, plus 10 in
22 suspicious or highly suspicious category?

1 A. Correct.

2 Q. Correct? Okay. The rest of them were
3 not in suspicious or highly suspicious category,
4 correct?

5 A. I can only assume that. I don't know for
6 a fact.

7 Q. Okay. But they did some more work over
8 and above simply having a list of returned mail?

9 A. Yes.

10 Q. My question to you is, did anybody do
11 similar work with regard to the 35,000 returned
12 mail letters as to which challenges were made?

13 A. That, I don't know.

14 Q. Thank you. Now, let me ask you this.

15 In paragraph 5 of your declaration it
16 says, "On September 9, 2004, the Republican Party
17 of Ohio sent letters to newlyregistered voters in
18 5 Ohio counties: Cuyahoga, Franklin, Summit,
19 Hamilton, and Montgomery." Correct?

20 A. Yes, correct.

21 Q. All right. By the way, how do you know
22 that?

1 A. Through conversations with my political
2 director.

3 Q. Your political director?

4 A. Blaise Hazelwood, sorry.

5 Q. She told you that?

6 A. Yes.

7 Q. When?

8 A. Probably midSeptember, that the Ohio
9 state party was going to do a mailing of new
10 registered voters.

11 Q. And how did she know that?

12 A. Through conversations.

13 Q. With whom?

14 A. With regional political director and the
15 Ohio -- or the state Republican Party of Ohio.

16 Q. So she talked to her own regional
17 director, that's Mr. James?

18 A. Yes, sir.

19 Q. And also to people at the state party,
20 Republican Party in Ohio?

21 A. Yes. We were made aware that they were
22 going to be doing a mailing.

1 Q. All right.

2 A. And Mr. Bennett was very vocal about
3 this.

4 Q. Okay. And he spoke to Blaise?

5 A. I cannot say that he spoke to Blaise
6 Hazelwood. I don't really know who at the party
7 she spoke to.

8 Q. But somebody at the Republican Party of
9 Ohio?

10 A. Yes.

11 Q. Okay. Now, if you look at tab 3.

12 A. Yes, sir.

13 Q. What's that?

14 A. That is the letter that the Republican
15 National Committee sent to newly registered voters
16 in Cuyahoga County.

17 Q. And I think I better be clear. This is
18 tab 3 to your declaration?

19 A. It is.

20 Q. Which has been marked Exhibit?

21 A. Exhibit 8.

22 Q. Exhibit 8. All right.

1 And you say tab 3 is a copy of the letter
2 that was sent by the RNC to newlyregistered voters
3 in Cuyahoga County?

4 A. Yes, sir.

5 Q. Okay. Then if you turn to tab 4, what's
6 that?

7 A. That is the letter that the Republican
8 state party of Ohio sent to the newlyregistered
9 voters in the five counties that you just
10 mentioned.

11 Q. And am I right the letters are the same?

12 A. The difference in the letters are that
13 the Republican National Committee letter directs
14 the newly registered to visit our website at the
15 Republican National Committee. The Ohio Republican
16 Party letter directs the newly registered to go to
17 the Ohio Republican Party website.

18 Q. But other thanthat, the text of the
19 letters is identical, correct?

20 A. The text is identical and-- yes.

21 Q. How did that happen?

22 A. We commonly share direct mail.

1 Q. What does that mean?

2 A. They knew the letter that we had sent out
3 and they used the same letter. It's a good letter.

4 MR. BURCHFIELD: There's some serious
5 form of flattery.

6 BY MR. NIELDS:

7 Q. Now, did anybody at the RNC share with
8 anybody at the Republican Committee in Ohio the
9 results of the RNC's mailing to Cuyahoga County
10 newly-registered voters?

11 A. Well, the Ohio Republican Party received
12 the undelivered letters that the RNC mailed out.

13 Q. So they knew how many undelivered letters
14 there were?

15 A. I would assume so. I'm not sure, but I
16 would assume so. They were delivered there and
17 then sent to us.

18 Q. I think you said a list was sent to you.

19 A. A list was sent to us.

20 Q. Okay. So they had a-- they had to have
21 a list or else they couldn't have sent it to you?

22 A. Correct.

1 Q. So they knew how many, how many letters
2 came back returned undelivered?

3 A. I would assume so.

4 Q. Okay. And then people at the RNC did
5 some analysis on that?

6 A. Correct.

7 Q. Did they share that with anyone at the
8 Republican Committee in Ohio?

9 A. I can't say that the information was
10 shared, no.

11 Q. Well, do you know that it wasn't?

12 A. I don't know that.

13 Q. You never asked?

14 A. I do know that the data files were
15 separated and we kept our-- we kept our file, they
16 kept their file. And the two were never compiled
17 together.

18 Q. Yeah, but my question is different.

19 Do you know whether -- did you ever ask
20 anybody whether they shared the subsequent analysis
21 that had been done at the RNC on this list?

22 MR. BURCHFIELD: Object to the form and

1 foundation, scope.

2 THE WITNESS: When talking to my regional
3 political director today, David James, I
4 specifically asked if the two lists had ever been
5 put together. And the answer was no.

6 BY MR. NIELDS:

7 Q. Okay. But that isn't my question.

8 My question is, did you ask anyone
9 whether the analysis that had been done by the RNC
10 on the list which is Exhibit 9A had ever been
11 shared with anyone at the Republican Party in Ohio?

12 MR. BURCHFIELD: Same objections.

13 THE WITNESS: I don't know, I don't know.
14 I'm assuming it was not, but I can't say for sure.

15 BY MR. NIELDS:

16 Q. Did you ever ask anyone?

17 A. I didn't ask it that way, no.

18 Q. Now, how many letters came back
19 undelivered from the mailing done by the Republican
20 Party of Ohio?

21 A. Well, as you'll see in number 5, point 5
22 in my declaration, 15,000, a little over 15,000

1 were returned.

2 Q. How did you learn that?

3 A. How did I learn that?

4 Q. Yes.

5 A. Through conversations with my political
6 director and information that she had gotten from
7 the Republican Party of Ohio.

8 Q. When?

9 A. I can only go in time frames. I know it
10 was after the convention.

11 Q. Approximately when?

12 A. Mid-September.

13 Q. Okay. So Blaise--

14 A. I'm sorry, Blaise Hazelwood.

15 Q. -- Hazelwood had conversations with
16 people in the Republican Party of Ohio and passed
17 that information on to you?

18 A. Yes.

19 Q. That's correct?

20 A. That is correct.

21 Q. About the number of mailings that were
22 returned undelivered?

1 A. From the five counties that were mailed
2 by the Ohio Republican Party.

3 Q. Okay. So they shared that information
4 with the RNC?

5 A. Yes.

6 Q. Now, were there any discussions about
7 that information within the RNC?

8 A. The discussions, again we looked at-- we
9 discussed percentages, the percentage that were
10 returned versus the percentage that was mailed out
11 to the newly registered, to see if there was
12 anything strange about that.

13 Q. Did you think that this was an indication
14 of fraudulent registering?

15 A. Quite honestly, and I can't remember the
16 breakdown by specific counties but at one time I
17 believe I knew, in some places yes, and some places
18 no.

19 Q. So you thought that there were some
20 places where it was fraudulent and other places
21 where it wasn't?

22 A. In some counties it appeared that there

1 was a lower percentage of returns, maybe 2 to
2 3 percent. In other places there were perhaps
3 10 percent or above.

4 Q. So you thought this was a-- how about
5 overall?

6 A. Overall--

7 MR. BURCHFIELD: Object to form.

8 THE WITNESS: Yeah, I'm not sure that--

9 BY MR. NIELDS:

10 Q. Did you regard these as sufficiently high
11 overall that it was an indication of voter fraud?

12 A. You know, I'm not sure that it really
13 mattered in my world. It was a number that I was
14 given. We looked at the numbers to give us an idea
15 of the returns and whether or not they were
16 potentially voter irregularities. And that was
17 about it.

18 Q. Did you talk about it to other people at
19 the RNC?

20 A. My political director.

21 Q. Talked about whether this was indication
22 of voter fraud?

1 (Ms. Browne entered the room.)

2 THE WITNESS: Was concerned that it could
3 possibly be voter irregularities.

4 BY MR. NIELDS:

5 Q. Did you believe that there were any steps
6 that you could take to deal with these voter
7 irregularities or fraud?

8 A. No, sir.

9 Q. Didn't believe there were any steps you
10 could take at all?

11 A. No, sir.

12 Q. You thought the consent order prevented
13 you from taking any steps at all?

14 A. We were very careful, as we were warned
15 by our counsel, what the lists could be-- what the
16 RNC list could be used for.

17 Q. Okay. But that -- okay. So you didn't
18 think you could use the RNC list as a-- for any
19 purpose?

20 A. Correct.

21 Q. Did you think you could use the
22 Republican Committee of Ohio list for any purpose?

1 MR. BURCHFIELD: Well, object to--
2 object to form, "any purpose." But go ahead.

3 THE WITNESS: No. It wasn't our mailing,
4 it was the Ohio state party's mailing, and they
5 were going to determine what they would do with
6 this mailing, the returned mail.

7 BY MR. NIELDS:

8 Q. Was there any discussion of finding a way
9 that you felt was okay to do something about this
10 indication of voter irregularities?

11 A. We were concerned about voter
12 irregularities, and again we are very knowledgeable
13 and aware of the consent decree and were warned not
14 to discuss it.

15 Q. Did you think that if, instead of using
16 your list or the Republican Party of Ohio's list,
17 that you would be able to use a list generated from
18 mailings by the election boards in Ohio?

19 A. No, we did not. I did not think that.

20 MR. BURCHFIELD: "You" meaning the RNC in
21 this question?

22 BY MR. NIELDS:

1 Q. Yes.

2 A. I can't say that that was an option that
3 we came up with.

4 Q. Who came up with it?

5 A. I think it was discussed by Chairman
6 Bennett with regards to the returns. Again, my
7 recollection is primarily from the Cuyahga County
8 Board of Elections returns, which were the packets
9 that they regularly send out to newlyregistered
10 voters throughout the state. And there was an
11 ordinary -- extraordinary number of returns that he
12 had mentioned and talked about, both as I said on
13 TV and in news articles.

14 Q. Now, in the brief that's been filed in
15 this matter, on page 5--

16 A. Number 10?

17 Q. No, this is the brief.

18 MR. BURCHFIELD: No, he's talking about
19 the brief.

20 THE WITNESS: Oh, I'm sorry.

21 MR. NIELDS: So you may want to look at
22 this.

1 MR. BURCHFIELD: Page 5?

2 MR. NIELDS: Yeah.

3 MR. BURCHFIELD: I am showing her my copy
4 of the brief.

5 BY MR. NIELDS:

6 Q. Okay. First look at the-- let's start
7 with the first page. It says in the second
8 paragraph, second sentence, it says the Republican
9 Party of Ohio has challenged voter registrations
10 based primarily on returned race neutral mailings
11 to voters by the Ohio County Boards of Elections.

12 Do you see that?

13 A. Yes, sir.

14 Q. And if you turn to page 5, there are two
15 paragraphs that discuss indications of voter fraud,
16 one of which begins with the word sixth.

17 Do you see that?

18 A. Yes, sir.

19 Q. And then the second full paragraph on the
20 page begins, and I quote, in view of this and the
21 fact that the names being challenged were drawn
22 overwhelmingly from county mailings that were

1 returned as undeliverable, rather than RNC
2 mailings, the Republican Party of Ohio initiated
3 statutory challenges to voter registrations.

4 Is that true to your knowledge, that
5 statement?

6 A. Yes, sir.

7 Q. Now, what is the basis for the part of it
8 that says that in view of the fact that the names
9 being challenged were drawn overwhelmingly from
10 county mailings that were returned as
11 undeliverable, rather than RNC mailings, the
12 Republican Party made the challenges? Why did--
13 why did that make a difference to the thinking
14 behind the challenges?

15 A. Well, the fact as I stated earlier, we
16 knew all along that any returns from the RNC
17 mailing could not be used as a challenge or any
18 type of ballot security.

19 Q. But you thought that other returns could
20 be?

21 A. The state party -- the state party of
22 Ohio determined that, not me.

1 Q. Well, how do you know that they
2 determined that?

3 A. Through various conversations, through
4 various articles and news reports.

5 Q. All right. And when was the-- when were
6 these conversations?

7 A. The conversations, the best of my
8 knowledge, were probably early to mid-October.

9 Q. All right. And who were the
10 conversations with?

11 A. Again, my conversations were with my
12 political people, my regional political director,
13 my counsels, and my political director, Blaise
14 Hazelwood, my regional political director, David
15 James, and members of our counsel at the RNC.

16 Q. And these occurred early to mid-October,
17 to the best of your recollection?

18 A. To the best of my recollection, as it
19 came out in the newspaper that tens of thousands of
20 these packets that are regularly sent by the
21 Cuyahoga Board of Elections with voter information
22 to specifically newly-registered voters were being

1 returned.

2 Q. Now, is it true that you already knew
3 that 15,000 had been returned from mailings that
4 had been made by the Republican Party of Ohio?

5 A. My recollection is that I did know, I
6 can't say that that was the number, but I did know
7 that the Ohio -- specifically the Ohio Republican
8 Party's mailing did in fact produce returns. To
9 the number, again, I can't exact say I knew it was
10 15. I knew it was around 10 or something.

11 Q. You knew it was a lot?

12 A. Yes.

13 Q. So why was this information about the
14 mailings, the returned mailings from the county
15 election boards, how did that change the picture?

16 A. I'm not sure I understand your question.
17 What picture were we changing?

18 Q. Well, as I understood it, you've said
19 that you learned in this October time period that,
20 based on the returned mailings from the counties,
21 county election boards, that the Republican Party
22 of Ohio decided to challenge.

1 A. Correct. Based on the returns from the
2 Cuyahoga Board of Elections, the actions taken by
3 Chairman Bennett, it was determined he would be
4 challenging the newly-registered voter returns
5 primarily from the Board of Election mailing.

6 Q. Why didn't he challenge based on the
7 returned mailings from the Republican Party of
8 Ohio?

9 A. I can't say that I know the answer to
10 that, sir.

11 Q. Well, have you asked?

12 A. I have not.

13 Q. Do you -- do you know what -- you said
14 you learned in this early October time frame that
15 the Republican Party was going to do this, correct?

16 A. That they were thinking of what they
17 would do with regards to the high number of returns
18 that they had from their Ohio state party mailing
19 and what they had seen or heard from the Cuyahoga
20 Board of Election mailing. And I believe that
21 Chairman Bennett was asked a question at the press
22 conference on October 20th with regards to what he

1 intended on doing with the returns.

2 Q. And prior to October 20, in the early to
3 mid-October time frame, what did you learn about
4 the Republican Party of Ohio's intentions?

5 A. That they were going to consider what
6 they were going to do. But it was never really
7 discussed what they were going to do. Just that
8 they were going to consider based on the number of
9 returns.

10 Q. And how did you learn that?

11 A. Again, I learned it through my political
12 director, Blaise Hazelwood; my regional political
13 director, David James, with regards to the number
14 of returns, can't remember the specifics but
15 obviously, from my declaration, 15,000 that had
16 come in. There was a concern and they were
17 deciding what action would be taken.

18 Q. And how did they learn that?

19 A. Through conversations they had with the
20 Republican state party of Ohio.

21 Q. Did they discuss with the Republican
22 state party of Ohio whether it would be proper or

1 improper for the Republican state party of Ohio to
2 make such challenges?

3 A. Specifically in speaking to David James
4 today, he emphatically said that he informed them
5 that because of the consent decree he would not be
6 able to comment or be involved.

7 Q. Did he -- and how about Blaise Hazelwood?

8 A. I don't believe that she had any
9 conversations as to what they were going to do.

10 Q. And you say you don't believe she did.
11 Did you ask her?

12 A. I did not specifically ask that question,
13 no.

14 Q. And do you know who else at the RNC spoke
15 to people at the state party of Ohio on the subject
16 of possible challenges to newlyregistered voters?

17 A. I would not know that there were any
18 discussions, but again, the folks at the RNC have
19 been trained and versed on the consent decree and
20 they know what they can and cannot talk to. Just
21 this year, our whole legal department met with each
22 individual division, going over the consent decree.

1 So we are always very careful.

2 Q. And when you go over the consent decree,
3 do you say that there are no challenges to voters
4 on the ground of suspected fraud that the RNC can
5 do?

6 MR. BURCHFIELD: Object to form.

7 THE WITNESS: I can't say that those are
8 the exact words.

9 BY MR. NIELDS:

10 Q. But is that the sum and substance of it?

11 MR. BURCHFIELD: Object to form.

12 THE WITNESS: My recollection would be
13 that we would engage in no ballot security, nor
14 voter challenges, based on the consent decree.

15 BY MR. NIELDS:

16 Q. Even race-neutral ones?

17 A. None whatsoever.

18 Q. But it was your understanding that the
19 state parties could?

20 A. It's my understanding the state parties
21 are independent and they can do what they want. We
22 don't control the state parties. As a matter of

1 fact, in this case, as I said earlier, this is
2 probably the premier state party in the country.

3 Q. And getting back to an earlier question,
4 I want to make sure I got the answer to. Besides
5 Blaise Hazelwood and Mr. James and Mr. Gillespie,
6 did you ask anyone else at the RNC whether they had
7 discussions with the Republican Party of Ohio about
8 possible challenges?

9 A. I did not.

10 Q. How were the five counties in Ohio
11 selected?

12 MR. BURCHFIELD: Object to form and
13 foundation.

14 BY MR. NIELDS:

15 Q. How were the-- withdraw the question.

16 In paragraph 5 of your declaration--

17 A. Yes, sir.

18 Q. -- you mentioned five counties in Ohio--

19 A. Yes, sir.

20 Q. -- to whom the Republican Party of Ohio
21 sent mailings.

22 A. Yes, sir.

1 Q. How were they selected?

2 MR. BURCHFIELD: Same objection.

3 THE WITNESS: Best of my recollection,
4 through conversations that I got second or
5 thirdhand, these counties were picked based on the
6 size and the high number of newlyregistered
7 voters. These would be the five top counties that
8 had highly -- that had high newly -- number of high
9 newly-registered voters. I'm sorry, I can't get
10 that out.

11 BY MR. NIELDS:

12 Q. And who did you learn that from?

13 A. Again in conversations we have with
14 our -- my political people, my regional political
15 director, David James; and Blaise Hazelwood, my
16 political director.

17 Q. Before we broke last time I think I was
18 asking you about any effort you made to review
19 documents in preparation for your affidavit. And I
20 think you said press releases and the papers that
21 had been filed by the Intervenors?

22 A. Yes.

1 Q. And that's it?

2 A. And briefed by a team of attorneys.

3 Q. And briefed by a team of attorneys?

4 A. At the Republican National Committee.

5 Q. Who told you what?

6 A. What -- I'm not a lawyer. So what -- the
7 document from the Intervenors, they outlined that
8 for me. And we discussed past information that I
9 would have from a variety of different meetings or
10 calls over the last six, eight, ten, twelve months.

11 Q. This is you telling them things or them
12 telling you things?

13 A. A little bit of both. Again, many times
14 I had attorneys in meetings with me.

15 Q. And is there some part of your
16 declaration that is based on what the attorneys
17 told you?

18 A. I'm not sure I really understand the
19 question. It's all factual information.

20 Q. Right. But I'm trying to figure out how
21 you learned this factual information.

22 And my question is, is there information

1 in here that you learned only from attorneys that ,
2 were briefing you?

3 A. No.

4 Q. Who is Tim Griffin?

5 A. Tim Griffin is our director of research.

6 Q. And I apologize but I can't remember your
7 answers to my prior questions sometimes. Was the
8 research department involved in analyzing the list
9 of returned mail?

10 A. Yes.

11 MR. BURCHFIELD: Object to form.

12 Go ahead.

13 THE WITNESS: Okay. Yes. As earlier
14 stated, we had several staffers from the research
15 division in Ohio that did some research on the list
16 from the RNC mailing.

17 BY MR. NIELDS:

18 Q. Now, correct me if I'm wrong, but I
19 understood from your declaration that you had said
20 that the purpose of the mailings was marketing?

21 A. I never said that.

22 Let me back up. The purpose of what

1 mailing, sir?

2 Q. The mailings by the RNC to
3 newly-registered voters in Cuyahoga County.

4 A. The purpose of the mailing to
5 newly-registered voters from the Republican
6 National Committee?

7 Q. Yes.

8 A. Was to welcome new registered voters and
9 give them information about the Republican Party
10 and urge them to go to our website.

11 Q. Okay. I stand corrected. I simply used
12 the wrong word.

13 A. I apologize. I don't even remember you
14 asking me the question of why the mailing was done.

15 MR. BURCHFIELD: It may be just about
16 break time for both of you, so when you get to a
17 point.

18 MR. NIELDS: Yes, it's getting close.

19 BY MR. NIELDS:

20 Q. So we'll take that purpose.

21 A. Okay.

22 Q. Why, given that as the purpose, were t~~he~~

1 returned mailings analyzed for voter
2 irregularities?

3 A. Again, as I said earlier, we cataloged
4 the information and stored it, perhaps to later use
5 for public relations. And if necessary, based on
6 what the Democrats had been reporting over the last
7 several months but in particular the last several
8 weeks, that they were going to contest this
9 election. Ohio, a battleground state, which is a
10 competitive state right now, this information later
11 on could be valuable.

12 MR. NIELDS: Let's take a break.

13 (Recess taken at 8:03 p.m.)

14 (Deposition resumed at 8:35 p.m.)

15 MR. LEVINE: My name is Jason Levine.
16 I'm another attorney with McDermott, Will & Emery,
17 and also counsel for the Republican National
18 Committee in this matter.

19 And I am producing to counsel documents
20 Bates numbered RNC 000147 through RNC 000185.
21 These are E-mail documents that came from the RNC's
22 files today, they were searched for and found

1 today, and they're being provided at the deposition
2 as the culmination of the document production by
3 the RNC in response to the Intervenor's document
4 requests.

5 MR. BURCHFIELD: The question came up
6 earlier as to where the remaining 3,300 -- the
7 remaining list of 3,300 returned mailings from the
8 RNC is, given that the exhibits 9A and 9B have
9 apparently some 900 or so names.

10 The information is that there is no
11 printed grid with the addresses, the names and
12 addresses of the others, that these grids were
13 prepared as indicated on Exhibit 9B2 as the grid of
14 those mailings, those returned mailings that were
15 reviewed. And it shows there are 950 that were
16 reviewed. That should fairly closely correlate to
17 the number on these documents.

18 People at the RNC, after you raised the
19 question, Mr. Nields, have checked and they believe
20 that there is no-- that there was never a data
21 entry exercise to put in the entire 3,300.

22 I would further note that the returned

1 number here, 2,943, appears to be an interim
2 number, based upon what we know now. There is a
3 count, but there's not a list. So I hope that's
4 helpful.

5 MR. NIELDS: Is there a document that
6 reflects the count?

7 MR. BURCHFIELD: The current count? This
8 one reflects the count as of the time this grid was
9 prepared, and the count at that time of returned
10 was 2,943. Apparently there were-- there were
11 ones coming in after this.

12 MR. NIELDS: Yeah, but is there a
13 document that reflects the total count?

14 MR. BURCHFIELD: I will inquire about
15 that.

16 MR. NIELDS: Would you inquire about
17 that?

18 MR. BURCHFIELD: Yeah I will do so.

19 MR. NIELDS: Look, here's what I think we
20 should do. I think we should go for another 10 or
21 15 minutes now. It's conceivable, but I'm not
22 sure, we may get into another document question.

1 And then we can break, if there is
2 another document question we can break before I
3 read these, and then we can come back for that and
4 you can have maybe done some more due diligence.
5 Okay?

6 MR. BURCHFIELD: Will you inquire about a
7 document containing the final count? I think Sean
8 is still over there. So containing the final count
9 of returns from the August RNC mailing. And
10 hopefully you can report on that.

11 MR. LEVINE: Yes.

12 THE WITNESS And if he's not there, he's
13 fired.

14 MR. BURCHFIELD: Right. Okay. So you
15 want to go for another 10, 15 minutes now?

16 MR. NIELDS: I think that's about what
17 I've got before we can break and go through this.

18 MR. BURCHFIELD: Okay, great.

19 BY MR. NIELDS:

20 Q. Ms. Cino, I want to return to the RNC
21 mailing. You understand which I'm--

22 A. Yes.

1 Q. It's the one covered by paragraph 4 of
2 your declaration on August 10th.

3 A. August 10th.

4 Q. Why were the letters that were sent out,
5 why did the returns from them go to the Republican
6 Party of Ohio?

7 A. It's simply a direct mail technique. Our
8 feeling was if we had the return to Washington,
9 D.C., and the Republican National Committee on it,
10 people would be less likely to read it. And if we
11 had the state party, the local-- the state party
12 return address in Ohio, they would be more likely
13 to read it.

14 Q. Now, when they open up the letter they
15 would see that it was from the National Committee,
16 correct?

17 A. Correct.

18 Q. But in any event, as a result of this,
19 the RN -- although the RNC did the mailing, the
20 state party found out how many undeliverables there
21 were, correct?

22 A. Correct.

1 Q. Who is Robert Trainum?

2 A. Robert Trainum is an RNC-- I believe is
3 an RNC legal -- senior advisor on legal issues.

4 Q. Is he a lawyer?

5 A. I am not sure of that. He is not
6 directly on staff at the Republican National
7 Committee.

8 Q. I'm sorry, then what's his relationship
9 to the Republican National Committee?

10 A. The truth is, I've seen his name on
11 E-mails and papers and it's listed as senior
12 advisor to the Republican National Committee.

13 Q. And who does he advise, who does he
14 report to?

15 A. The things that I have seen him do are
16 mostly TV and radio interviews.

17 Q. What is his involvement in the mailings?

18 A. I don't know him to have any involvement
19 in the mailings.

20 Q. Okay. And was he involved in any
21 discussions that you have mentioned earlier about
22 the mailings?

1 A. No discussions that I'm aware of that I
2 was involved with.

3 Q. Who is Tara Wall?

4 A. I don't know.

5 Q. You testified to a regional office in--

6 A. I testified that we have a regional
7 political director. They live in a state that they
8 are responsible for, but we d not have regional
9 offices.

10 Q. Okay. And David James is the regional
11 political director for the region that encompasses
12 Ohio?

13 A. Yes, sir.

14 Q. And where is he, where does he live?

15 A. He lives in Pennsylvania.

16 Q. And how much of his time does he spend in
17 Ohio?

18 A. It varies from beginning of cycle to end
19 of cycle.

20 Q. All right. Let's focus on the period
21 August to November, '04-- August to the end of
22 October, '04.

1 A. Beginning of August, the best of my
2 knowledge, he would probably be traveling from Ohio
3 to Pennsylvania. End of August, he spent two weeks
4 at the Republican National Convention in New York
5 City. And September, probably a little more travel
6 to Ohio than Pennsylvania. I'm guesstimating here
7 that he probably moved pretty much fulltime to
8 Ohio, guesstimating late September.

9 Q. How often does he talk to people in the
10 Republican Party of Ohio?

11 A. All the time. It's his significant
12 state.

13 Q. And how does he help them?

14 A. He helps them right now with regards to
15 making sure that our Get Out the Vote program is
16 organized and implemented.

17 Q. Any other ways?

18 A. He would be involved in a variety of
19 different conversations. When you work in the same
20 office day in and day out, he's probably drug in a
21 lot of different meetings that I would have no
22 knowledge of.

1 Q. Drug into a lot of meetings?

2 A. Different meetings.

3 Q. Where?

4 A. On various subjects that would affect the
5 election.

6 Q. Meetings with whom?

7 A. Republican Party officials, elected
8 officials, campaign officials.

9 Q. But when he's in Ohio, is he at the
10 Republican Party of Ohio offices?

11 A. He works somewhat out of the office in
12 Columbus, but also spends an amount of time
13 traveling from county to county.

14 Q. But when you say drug into meetings, I
15 take it you were referring to being drug into
16 meetings --

17 A. He participates--

18 Q. -- at the offices of the Republican Party
19 of Ohio?

20 A. Yes, as well as meetings in counties, as
21 well as campaign meetings, as well as candidate
22 meetings.

1 Q. Getting back to the mailing that was done
2 by the RNC, who paid for that?

3 A. The RNC paid for that mailing.

4 Q. Going to the mailing that was done by the
5 Republican Party of Ohio, who paid for that?

6 A. My knowledge, it was paid for by the
7 Republican Party of Ohio.

8 Q. I think you testified earlier that the
9 RNC did training for state legal, state lawyers.

10 A. The RNC did training I believe for the
11 state party of Ohio, which entailed legal training.

12 Q. What sort of legal training?

13 A. Specifically we talked about Election Day
14 activities and we talk about -- and we go through
15 our Poll Watcher 2004 Manual.

16 Q. Now, before we broke I think I asked you
17 who Tim Griffin was.

18 A. Yes, sir.

19 Q. Is he in charge of research?

20 A. Yes, he is, he's the director of
21 research.

22 Q. Okay. And is there a person under him

1 who handles research for Ohio?

2 A. The staff of research fluctuates,
3 depending on the types of projects that we're
4 doing. And I could not say that there was just one
5 person assigned to Ohio. It's usually done on
6 subject matter.

7 Q. All right. Can you tell me the names of
8 people who worked on some subject matters in Ohio?

9 A. No, I can't. It's a staff of 40.

10 Q. But whoever would do research on Ohio
11 would report to Mr. Griffin?

12 A. Yes, any research that's done would be
13 reporting to Mr. Griffin.

14 Q. If you could look at Exhibit 2. It's a
15 Wall Street Journal article I asked you about
16 earlier.

17 A. Yes, sir.

18 Q. Do you know who at the RNC spoke-- well,
19 first, do you know if anyone at the RNC spoke to
20 the reporter, Jeanne Cummings, in connection with
21 this article?

22 A. I do not know that for a fact.

1 Q. Do you have an idea of who it was?

2 A. The two people that would be most likely
3 to talk to a Wall Street Journal reporter would be
4 our communications director, Jim Dike, or our press
5 secretary, Christine Iverson.

6 MR. NIELDS: I'd like this marked Exhibit
7 10.

8 (Exhibit 10
9 marked for identification)

10 BY MR. NIELDS:

11 Q. Ms. Cino, I put in front of you an
12 exhibit --

13 MR. BURCHFIELD: Can I get one of those?

14 MS. BUTLER: Oh, I'm sorry.

15 BY MR. NIELDS:

16 Q. Exhibit 10. Fourpage document bearing
17 Bates stamps number RNC 000131 to Bates stamp
18 number RNC 000134.

19 A. Yes, sir.

20 Q. Have you seen this document before?

21 A. I have.

22 Q. And what is it?

1 A. Basically it's a document with regards to
2 Pennsylvania.

3 MR. BURCHFIELD: And it was inadvertently
4 produced in my rush.

5 MR. NIELDS: I don't think it was so
6 inadvertent. I think you shouldn't fault yourself
7 so much.

8 If you look at the bottom of page 3--

9 THE WITNESS: I'm sorry, what-- okay.
10 Which is what is on the top? Headquarters meeting?
11 Pages are numbered 152, 153--

12 BY MR. NIELDS:

13 Q. I'm sorry. I'll identify it by Bates
14 number RNC 000133.

15 A. Yes, sir.

16 Q. That's a reference to Ohio on the bottom
17 of that page, correct?

18 A. Yes, sir.

19 Q. It talks about "Please call/attend during
20 your state's time slot"?

21 A. Yes, sir.

22 Q. And there's several states tat have time

1 slots, Ohio being one and Pennsylvania also being
2 one, correct?

3 A. Yes, sir.

4 Q. Now, going back to the first page of the
5 exhibit, what is it?

6 A. It appears that this is a call with
7 regards to HAVA.

8 Q. It says HAVA Election Day preparation,
9 call number 2?

10 A. I'm sorry, what sheet are you look at
11 now?

12 Q. The first sheet. Subject-- it's an
13 E-mail, correct?

14 A. Yes, I'm sorry.

15 Q. Okay. Let's take it in bites.

16 From Mike Roman to Anne Bradbury and some
17 others, correct?

18 A. Yes, sir.

19 Q. Who is Mike Roman?

20 A. All I know is he worked in Pennsylvania,
21 but I don't know what his position is.

22 Q. Okay. And who is Anne Bradbury?

1 A. Anne Bradbury is an ElectionDay
2 coordinator.

3 Q. For whom?

4 A. For the Republican Party of Pennsylvania
5 is what I believe.

6 Q. And how did this find its way into the
7 possession of the RNC?

8 A. This is-- well, I'm not sure if these
9 are two different meetings. From the looks of
10 this, I don't see at least on the first page an RNC
11 employee. And the only NC employee is on the
12 October 25th E-mail, 000133.

13 Q. And who is that? Who's the RNC employee
14 mentioned--

15 A. The RNC employees--

16 Q. -- on that page?

17 A. The first, Randy Kammerdiener is a
18 regional political director in Florida. Randy
19 Enwright is a regional political director in
20 Florida. Anne Hathaway has the region of the--
21 regional political director. David James, regional
22 political director.

1 Q. Who we've already talked about?

2 A. John Eschong --

3 Q. Okay. You don't need to keep going. You
4 don't need to keep going.

5 A. Okay. That's fine.

6 Q. Unless you want to.

7 Now, on the firstpage, it starts off, "I
8 have a call this evening at 8 p.m. with national."

9 What is national?

10 A. I don't know.

11 Q. Is that the RNC?

12 A. I would only be speculating to say it
13 was.

14 Q. Do you know what this-- what this E-mail
15 or pair of E-mails relates to?

16 A. Based on subject, HAVA and Election Day
17 preparation

18 Q. Okay. There's a reference to number of
19 poll watchers.

20 A. Yes, sir.

21 Q. And then there's, on the second page,
22 there's "Please also find the agenda forthe call,"

1 it says HAVA recruitment and structure, A, number
2 of retained counsel; B, number of county
3 litigators; C, number of legal roving teams; D,
4 number of poll watchers; E, number of problem
5 precinct poll watchers, and so forth.

6 A. Yes, sir.

7 Q. Is this a conference call with a series
8 of states in which somebody at headquarters, RNC
9 headquarters, is doing planning, including poll
10 watchers for Election Day?

11 A. Again, I interpret this as a string of
12 E-mails. The first E-mail, starting with 00131,
13 involving people from the Pennsylvania
14 organization, there is not an RNC person in this
15 chain of E-mails, discussing Pennsylvania Election
16 Day HAVA program. And I believe that the last page
17 is an announcement for a meeting on HAVA Election
18 Day operations, but I can't say that it's the same
19 meeting.

20 MR. NIELDS: Okay. This will be marked
21 Exhibit 11.

22 (Exhibit 11

1 marked for identification.)

2 BY MR. NIELDS:

3 Q. I'm putting in front of you a document
4 marked Exhibit 11.

5 Have you seen this before?

6 A. I have not. I don't believe I have.
7 I've seen so many documents, I can't be sure.

8 Q. Okay. Well, I'm going to ask you about
9 some of the people named in this document first.

10 Who is Christopher McInerney?

11 A. Christopher is in our research
12 department.

13 Q. Who is Shawn Reinschmiedt?

14 A. It appears, based on this header, also in
15 research, in our research department.

16 Q. Who is Michael Neal?

17 A. That, I don't know. It says political,
18 but I -- I don't know. He might be in one of the
19 states, but I have no idea.

20 Q. All right. On the top of the first page
21 there's a message that says, "Michael, I need to
22 get our most comprehensive list of numbers tonight

1 to Chairman Gillespie out here in Columbus for his
2 press conference tomorrow. Do you have the
3 original lists that the outreach mailings went to?
4 Or do you know who might have them?"

5 Do you see that?

6 A. I do.

7 Q. Do you know what lists he's talking
8 about?

9 A. I do not.

10 Q. Now, if you go to the second page of the
11 exhibit -- well, no, just stay with the first page.

12 A. Okay.

13 Q. Toward the bottom, there's an Email from
14 Christopher McInerney to Shawn Reinschmiedt, re,
15 HAVA return list. And it says, "I need the entire
16 universe that the second mailing web to. Do you
17 know who has that?"

18 Do you know what the second mailing is
19 he's talking about?

20 A. No. It would be purely speculation on my
21 part.

22 MR NIELDS: Well, I guess my request

1 would be this, from counsel. And that is, if there
2 is a second mailing return list that relates to the
3 Ohio mailings, I would be grateful if you would ask
4 the people in this Email chain whether they have
5 it.

6 MR. BURCHFIELD: I will endeavor to do
7 so. It is my understanding, however, that they
8 were looking for any such list in the scope of
9 their request, and it should have turned up. But
10 we will ask again.

11 MR. NIELDS: I note that there's a from
12 Shawn Reinschmiedt and it says-- she seems to say,
13 "In any event, if you have it please
14 send...directly to Michael Neal, if you could. If
15 not at your fingertips, I'll find it on my computer
16 and send it in the morning."

17 MR. BURCHFIELD: We'll inquire.

18 MR. NIELDS: So we might ask her
19 computer.

20 I'd like this marked Exhibit 12.

21 (Exhibit 12
22 marked for identification.)

1 BY MR. NIELDS:

2 Q. Put in front of you a document marked
3 Exhibit 12. I'm sorry, I don't have copies of it.
4 Do you know what that is?

5 A. It appears to be, just based on what the
6 header is, challenge of rights to vote and
7 correction of registration list.

8 Q. For Ohio?

9 A. I'm not sure if it's specifically for
10 Ohio, but the person on here is from Ohio.

11 Q. The voter--

12 A. I would believe--

13 Q. -- or the objector?

14 A. -- they're both from Ohio. It appears
15 that this is a challenge to a voter.

16 MR NIELDS: Thank you. Let's take a
17 break.

18 (Recess taken at 9:03 p.m.)

19 (Deposition resumed at 9:53 p.m.)

20 (Exhibit 13
21 marked for identification.)

22 BY MR. NIELDS:

1 Q. Okay. Back on the record.

2 I have put in front of you, Ms. Cino, a
3 document marked Cino Exhibit13. It's a many-paged
4 document, seems to be mainly Emails of one kind or
5 another. They bear Bates stamps number RNC 000147
6 through RNC 000185.

7 And my first question is, have you ~~sen~~
8 this document before?

9 A. Yes.

10 Q. When did you first see it?

11 A. About an hour ago.

12 Q. Okay. And are you familiar with the
13 matters that are described in here?

14 A. Somewhat.

15 Q. Okay. Well, let's turn to the back of
16 it. Second to last page, most of the way down
17 toward the bottom there is an Email from Lauren
18 Barnett, political?

19 A. Yes.

20 Q. And who is she?

21 A. She is the executive assistant to Blaise
22 Hazelwood, the political director.

1 Q. Okay. And it's to a bunch of people.
2 With the exception of the last name, which looks
3 like apostrophe TLOWN, are the others all RNC
4 folks?

5 A. The first two are RNC. The third one, I
6 can't speak to. Nor the fourth one, nor the fifth
7 one. And after that, I don't know who David, John
8 Parker or -- I just recognize the first two.

9 Q. How about Wade Lairsen and Michael Neal?

10 A. Do not.

11 Q. You don't recognize those?

12 A. I do not.

13 Q. And how about ltown@georgewbushcom, who
14 is that, do you know?

15 A. I do not.

16 Q. Okay. Now, it says, subject, voter reg,
17 which I assume is registration, so voter
18 registration, fraud strategy conference calls.

19 Do you see that?

20 A. Yes, I do.

21 Q. And do you know anything about voter
22 registration fraud strategy conference calls?

1 A. I did not participate and thus I do not
2 know.

3 Q. I mean did you know that there was such a
4 thing, that there were voter registration strategy
5 conference calls?

6 A. The only voter registration calls that I
7 recall had to do with registering new voters.

8 Q. Okay. And just to be clear here, have
9 you ever -- in your investigation for preparing
10 your declaration, did you talk to any of these
11 people --

12 A. No, I have not.

13 Q. -- concerning voter registration
14 conference calls?

15 A. No.

16 Q. Okay. If you turn forward in time, I'm
17 sort of going from back to front because I think
18 that's sort of the way--

19 A. That's okay.

20 Q. -- time moves here more or less. Go to
21 page RNC 000173.

22 Do you have that in front of you?

1 A. I do.

2 Q. There's an Email toward the bottom from
3 Shawn Reinschmiedt. Who is that?

4 A. He works in our research department,
5 based on the return.

6 Q. I'm sorry, based on the return E-mail?

7 A. I'm sorry, based on research, slash,
8 communications. I think I've already testified
9 that I don't know who he is.

10 Q. Okay. And then it's to Dave DinHader?

11 A. Yes.

12 Q. Who is that?

13 A. He is a regional political director for
14 the Bush campaign.

15 Q. Okay. And then further down there's
16 somebody, Magan, Mike Magan?

17 A. Yes.

18 Q. Do you know who that is?

19 A. I do not.

20 Q. Do you know where he works?

21 A. Ohio GOP.

22 Q. That's the Republican Committee of Ohio?

1 A. Ohio, yes.

2 Q. And then down below that there's Mauk,

3 M-A-U-K. Do you know who that is?

4 A. I do not.

5 Q. Do you know where he works?

6 A. The Ohio Republican Party.

7 Q. And the subject, Cuyahoga returned list?

8 A. Yes.

9 Q. Is that the list of returned mail that
10 was sent out to Cuyahoga County?

11 A. I would have no way of knowing.

12 Q. Okay. Now if you go to a page Bates
13 stamped number RNC 000158. Do you have that in
14 front of you?

15 A. Yes.

16 Q. If you go down-- well, it's an E-mail at
17 the bottom half of the page.

18 A. Yes.

19 Q. From C. Guith?

20 A. Guith.

21 Q. Guith. Do you know who that is?

22 A. Yes.

1 Q. Who is that?

2 A. He works on the George W. Bush campaign.

3 Q. And it's to Tim Griffin, I think you've
4 testified about who that is.

5 A. Yes.

6 Q. I'm sorry, I'm in the wrong E-mail. The
7 one below it, from Tim Griffin to various people.

8 A. Yes.

9 Q. He refers to Jack Christopher. Do you
10 know who that is?

11 A. I do not.

12 Q. It says we've "tasked our IT person with
13 creating a match list between the BOE's return mail
14 list and the AB request list."

15 Do you know what the BOE's return mail
16 list is?

17 A. Yes.

18 Q. What's that?

19 A. It's the Board of Election.

20 Q. Okay. And the AB request list?

21 A. Absentee ballot request list.

22 Q. If you look at page RNC 000151.

1 A. Yes.

2 Q. There's an Email at the top of the page,
3 Tim Griffin, and in the body of the Email,
4 actually, it refers to bodies. And then it says in
5 the second paragraph, "why don't you ask your peeps
6 in each state at issue if they have resources to do
7 this."

8 Who are the peeps in each state?

9 A. I would only be able to speculate. I
10 would have no idea.

11 Q. Okay. Don't want you to speculate.

12 Now, just so I understand, just so I
13 understand E-mailese here, take a look at page--
14 maybe there's a better page, but this one will do,
15 RNC 000160.

16 A. Yes.

17 Q. You can look at the second to the last
18 sort of from/to. It's from Cuddy Johnson to
19 SReinschmiedt.

20 A. Yes.

21 Q. Okay. Now, there's an Email, after
22 SReinschmiedt at, it says rnchq.org.

1 What does the rnchq designate?

2 A. Republican National Committee.

3 Q. Headquarters?

4 A. Yes, I'm sorry, yes.

5 Q. And then below it there's Magan at
6 ohiogop.org.

7 What does that designate?

8 A. Ohio Republican Party.

9 Q. Okay. And then there are some here that
10 have georgewbush.com.

11 What does that designate?

12 A. George W. Bush campaign.

13 Q. Campaign? Now, on the very front page at
14 the very top it has a list of participants,
15 Chairman Gillespie, and you, Mike Duncan, Jim Dyke,
16 Tim Griffin, Jill Holtzman Vogel, Caroline Hunter.

17 Do you see those?

18 A. I do.

19 Q. Are these related to the Emails below,
20 do you know?

21 A. I have no idea.

22 Q. And I think you've told us up until an

1 hour ago you never received any of these Emails or
2 saw them?

3 A. None that I can recollect. I receive
4 thousands of Emails a week.

5 MR. NIELDS: Okay. I have nothing
6 further.

7 MR. BURCHFIELD: Thanks. Let me just
8 look at my notes.

9 (Discussion off the record at 10:06 p.m.)

10 (Deposition resumed at 10:08 p.m.)

11 EXAMINATION BY COUNSEL FOR DEFENDANT

12 BY MR. BURCHFIELD:

13 Q. I'll be brief.

14 Ms. Cino, Mr. Nields had asked you some
15 questions about the last two pages of Exhibit 13,
16 beginning on page 184. And in particular I'd like
17 to direct your attention to the Email from Lauren
18 Barnett dated September 30, 2004, to a number of
19 people.

20 Are you with me?

21 A. Yes.

22 Q. To the best of your knowledge, as of

1 September 30, 2004, had the Ohio Republican Party
2 announced either publicly or to anyone at the RNC
3 that it had planned to institute challenges to
4 voters on the basis of returned mail?

5 A. I can't be positive of the time frame.

6 Q. Let me ask you to look at the next page.
7 This E-mail refers to a conference call and on the
8 last page of this exhibit, with the last Bates
9 numbers 185, there's a list of people.

10 Do you recognize any of the people
11 there --

12 A. Yes.

13 Q. -- under suggested participants?

14 A. Yes.

15 Q. Who is Jill Holtzman Vogel?

16 A. She's our general-- chief counsel.

17 Q. Who is Caroline Hunter?

18 A. She is one of our lawyers at the RNC.

19 Q. Are they, to your personal knowledge
20 conversant with the requirements of the consent
21 decree in New Jersey?

22 A. Absolutely. They both have talked

1 extensively on it and have specifically informed
2 each of our directors and their employees at the
3 RNC.

4 Q. Are they-- are they the people at the
5 RNC who were charged with enforcing, principally
6 charged with notifying and enforcing the compliance
7 within the RNC with that decree?

8 A. Yes, they are.

9 Q. Let me ask you to look at page 158, still
10 on Cino Exhibit 13. And I believe that Mr. Nields
11 asked you with regard to this page about the
12 reference to Cuyahoga returned list.

13 Do you see that?

14 A. Yes.

15 Q. And I think you said in response to his
16 question that you didn't know what list was being
17 referred to there.

18 A. Right.

19 Q. Let me ask you to look at, later down in
20 the E-mail chain, page 160, there's an Email there
21 dated October 5, 2004, from Robert Paduchik.

22 A. Yes.

1 Q. Also subject, re, Cuyahoga returned list,
2 high.

3 Can you tell from the context of that
4 E-mail list what list he's referring to when he
5 says Cuyahoga returned list?

6 A. This appears that the Cuyahoga return
7 list is from the Board of Elections, a mailing.

8 Q. Not the returns of the RNC mailings
9 within Cuyahoga County that you talked about
10 earlier?

11 A. Yes, not the returns that I talked of
12 earlier.

13 Q. And not the returns from the Ohio
14 Republican Party list?

15 A. Not the returns from the Ohio Republican
16 Party list.

17 Q. Let me ask you to look-- Mr. Niels also
18 asked you some questions about the first few pages.
19 Page 149 at the bottom Mr. Paduchik, October 5,
20 2004, says, "I have just learned that Summit County
21 has received 200 AB," absentee ballot?

22 A. Yes.

1 MR. NIELDS: What page are we on? I'm
2 sorry.

3 MR. BURCHFIELD: 149 at the bottom, still
4 Cino Exhibit 13.

5 THE WITNESS: Yes.

6 BY MR. BURCHFIELD:

7 Q. I have just learned that Summit County
8 has received 200 absentee ballot requests from 100
9 voters, paren, these are people the BOE, Board of
10 Elections, mails address confirmation forms to and
11 their return is undeliverable, clse paren. If
12 this is true it is proof that people with
13 questionable registration are trying to vote
14 absentee.

15 Do you see that?

16 A. Yes.

17 Q. Having looked at the -- if that is true,
18 Ms. Cino, does that cause you concern?

19 A. No, it does not.

20 Q. Why not?

21 A. Well, this appears to be a discussion
22 with regards to the board-- Cuyahoga Board of

1 Election list of returns, undeliverable mail from
2 their mailing to do registered voters. And it
3 appears they have taken that list and are crossing
4 it with a list of absentee ballot requests, people
5 who have requested absentee ballots.

6 And there is a question as to whether or
7 not the Board of Elections list of undeliverables,
8 crossed with the absentee ballot requests, some of
9 the names are voter irregularities from the Board
10 of Elections. Thus, somebody would be requesting
11 an absentee ballot that the mailing from the Board
12 of Elections was returned and it's questionable.

13 Q. To your-- to your knowledge has the--
14 has the RNC undertaken-- does the RNC have a plan
15 to take any action with regard to this
16 cross-matching of undeliverable mailings with
17 absentee ballot requests?

18 A. No, it does not.

19 Q. If there were such a plan of action, who
20 would -- who would be the person that would need to
21 approve it?

22 A. It would have to be approved by our legal

1 counsel, Jill Holtzman and Caroline Hunter. Based
2 on what the consent decree said, they would deny
3 it.

4 MR. BURCHFIELD: Okay. Nothing further.

5 EXAMINATION BY COUNSEL FOR PLAINTIFF INTERVENOR
6 BY MR. NIELDS:

7 Q. I have another question.

8 When did people at the RNC learn that the
9 Ohio Republican Party had obtained the Ohio BOE
10 list?

11 A. I don't believe-- I can't give you that
12 date.

13 Q. But are you saying it's before, it's
14 before this date?

15 MR. BURCHFIELD: What date?

16 BY MR. NIELDS:

17 Q. I think it's October 5th.

18 A. Based on this particular set of Emails,
19 I don't think I can deduct that.

20 MR. NIELDS: Okay. I have nothing
21 further.

22 MR. BURCHFIELD: Thank you. Everyone

1 have a good evening. Off the record.

2 - - -

3 (Deposition concluded at 10:17 p.m.)

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1 ACKNOWLEDGMENT OF DEPONENT

2 I, MARIA CINO, do hereby acknowledge that I
3 have read and examined the foregoing one hundred
4 sixty (160) pages of testimony, and the same is a
5 true, correct and complete transcription of the
6 testimony given by me, and any changes and/or
7 corrections appear on the attached errata sheet
8 signed by me.

9

10

11

12

13 (Date) MARIA CINO

14

15

16

17

18

19

20

21

22

1 ESQUIRE DEPOSITION SERVICES
2 1020 19th Street, Northwest
3 Suite 620
4 Washington, D.C. 20036

5

6 ERRATA SHEET

7 Case Name: DNC v. RNC

8 Witness Name: MARA CINO

9 Deposition Date: October 29, 2004

10 Job No.: 163933

11 PAGE LINE CORRECTION

12

13

14

15

16

17

18

19

20

21

22 Signature

Date

1 CERTIFICATE OF STENOTYPE REPORTER- NOTARY PUBLIC

2

3 I, Sara A. Watt, Registered Professional Reporter,
4 the officer before whom the foregoing deposition
5 was taken, do hereby certify that the witness named
6 herein was duly sworn by me; that the foregoing
7 transcript is a true, correct, and complete record
8 of the testimony given; that said testimony was
9 taken by me stenographically and thereafter reduced
10 to typewriting by me; and that I am neither counsel
11 for, related to, nor employed by any of the parties
12 to this litigation and have no interest, financial
13 or otherwise, in its outcome.

14 IN WITNESS WHEREOF, I have hereunto set
15 my hand and affixed my notarial seal.

16

17

18 Sara A. Watt, Notary Public in
19 and for the District of Columbia
20 My Commission expires June 30, 2008.

21

22

1 Bobby R. Burchfield, Esquire
McDermott, Will & Emery
2 600 Thirteenth Street, Northwest
Washington, D.C. 20005-3096
3

Re: DNC v. RNC
4 Deposition of MARIA CINO

5 Dear Mr. Burchfield:

6 Enclosed for review is your copy of the above
referenced deposition. Please have the deponent
7 read the copy of the transcript and sign the
enclosed certificate of deponent. Also enclosed
8 is an errata sheet which the deponent should use to
note corrections and the reasons for such
9 corrections. This and any additional errata sheets
should be signed and dated by the deponent.

10
11 The deponent has thirty days in which to read
and sign the transcript. After the deponent has
reviewed the copy of the transcript, please return
12 the certificate of deponent and any errata sheets
to Esquire Deposition Service, 1020 19th Street,
13 Northwest, Suite 620, Washington, D.C., 20036.

14 Sincerely,

15
16 Sara A. Watt

17

18

19

20

21

22

Exhibit 3

Cuyahoga County

Info Key: CF (couldn't find), VR (verified residential), P (photo), B (Business), O (Other)

| FIRST | MID | LAST | SUF | ADDRESS 1 | CITY | ZIP | DATE | INFO/NOTES |
|-----------|-----|-------------|-----|---------------------------|----------------|-------|---------|------------|
| Nile | D | Smith | | 114 Tressel St | Berea | 44017 | 8/19/04 | |
| Joshua | S | Sheppard | | 114 Tressel St 105 | Berea | 44017 | 8/19/04 | |
| Jonathan | | Babic | | 144 Tressel St | Berea | 44017 | 8/19/04 | |
| John | M | Mason | III | 144 Tressel St 305 | Berea | 44017 | 8/19/04 | |
| Nicole | M | Wendling | | 171 E Center St | Berea | 44017 | 8/19/04 | |
| Dana | C | Hammond | | 171 E Center St 238 | Berea | 44017 | 8/19/04 | |
| Stephanie | L | Griffin | | 253 Beech St | Berea | 44017 | 8/19/04 | |
| Emily | T | Roll | | 253 Beech St | Berea | 44017 | 8/19/04 | |
| Andry | | Leonard | | 309 Beech St | Berea | 44017 | 8/19/04 | |
| Lauren | E | Welan | | 309 Beech St #NH | Berea | 44017 | 8/19/04 | |
| Alana | C | Jochum | | 65 Seminary St | Berea | 44017 | 8/19/04 | |
| Charles | E | Spradley | III | 77 W Bagley Rd 107 | Berea | 44017 | 8/19/04 | |
| Morgan | E | Schreiber | | 3715 Greenwood Dr | Moreland Hills | 44022 | 8/19/04 | |
| John | A | Rutter | III | 3740 Greenwood Dr | Moreland Hills | 44022 | 8/19/04 | |
| Patrick | E | Myers | | 1359 W 93rd St | Cleveland | 44102 | 8/20/04 | |
| Orrie | M | Lewis | | 1427 W 84th St | Cleveland | 44102 | 8/20/04 | |
| Avanette | S | Ford | | 1539 W 65th St | Cleveland | 44102 | 8/19/04 | |
| Rafael | | Hernandez | | 1842 W 77th St | Cleveland | 44102 | 8/19/04 | |
| Phillip | L | Harris | | 1892 W 54th St | Cleveland | 44102 | 8/20/04 | |
| Guillermo | | Torres | | 4512 Lorain Ave | Cleveland | 44102 | 8/20/04 | |
| Deinz | | Butterfield | | 116 Harvard Ave | Cleveland | 44105 | 8/20/04 | |
| Mary | | King | | 1946 W 47th st | Cleveland | 44105 | 8/20/04 | |
| Tommy | I | Foster | | 10621 Orville Ave | Cleveland | 44106 | 8/19/04 | |
| Aleisha | L | Rice | | 2380 Parkway Dr J | Lakewood | 44107 | 8/19/04 | |
| Crystal | | Gillo | | 11112 Lake Shore Blvd | Bratenahl | 44108 | 8/19/04 | |
| Michael | C | Jordan | | 16921 Lake Shore Blvd | Cleveland | 44110 | 8/19/04 | |
| Ronald | H | Newberry | Jr | 10727 Bellaire Rd Apt 201 | Cleveland | 44111 | 8/19/04 | |
| Bill | D | Smith | | 1234 W 10th St | Cleveland | 44113 | 8/19/04 | |
| Sharnice | M | Henderson | | 1500 W 9th St | Cleveland | 44113 | 8/19/04 | |
| Ohnisi | | Marshall | | 1892 Detroit Ave #805 | Cleveland | 44113 | 8/19/04 | |
| Britt | L | Williams | | 2000 Washington Ave #209 | Cleveland | 44113 | 8/19/04 | |
| Ismael | | Perez | | 3378 Franklin Blvd | Cleveland | 44113 | 8/20/04 | |

OH
Highly Suspicious

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|-----------|---|----------------|-----|----------------------------|----------------------|-----------|---------|--|
| Johnny | V | Marciano | | 3712 Detroit Ave 17 | Cleveland | 44113 | 8/19/04 | |
| Anthony | D | Hines | | 1637 E 18th St | Cleveland | 44114 | 8/19/04 | |
| Willow | D | White | | 2130 Euclid Ave | Cleveland | 44115 | 8/19/04 | |
| Sharon | A | Bailey | | 1034 Lake Rd | Rocky River | 44116 | 8/19/04 | |
| Larasha | J | Harris | | 1390 Lake Rd | Rocky River | 44116 | 8/19/04 | |
| Nancy | J | Toigo | | 16700 Lake Rd 506 | Rocky River | 44116 | 8/19/04 | |
| Roderick | G | MacBain | | 2100 Lake Rd | Rocky River | 44116 | 8/20/04 | |
| Donald | J | Probert | | 850 Smith Ct | Rocky River | 44116 | 8/19/04 | |
| Tiffany | R | Pleasure | | 11615 N Park Blvd | Cleveland | 44118 | 8/19/04 | |
| Amber | B | Williams | | 13896 Superior Rd 9 | East Cleveland | 44118 | 8/19/04 | |
| Toya | | Davis-Hamilton | | 17913 Brazil Rd | Cleveland | 44119 | 8/20/04 | |
| Fawaz | H | El-Khatib | | 1716 S Lyn Cir | South Euclid | 44121 | 8/19/04 | |
| Erik | D | Schloss | | 27075 Shaker Blvd | Benchmark | 44122 | 8/19/04 | |
| Rumph | J | Hollis | | 4345 Lee Rd | Cleveland | 44122 | 8/20/04 | |
| Kelly | R | Jacko | | 28266 Northwood Dr | Pepper Pike | 44124 | 8/20/04 | |
| Manuel | L | Hudson | | 3925 E 144th St | Cleveland | 44128 | 8/20/04 | |
| Donie | M | Peterson | | 4380 E 154th | Cleveland | 44128 | 8/19/04 | |
| Laurence | D | Byrd | III | 4807 Lawrence Dr | Warrensville Heights | 44128 | 8/19/04 | |
| Barbara | H | Walters | | 7988 Lakeview Dr | Parma | 44129 | 8/19/04 | |
| Lydia | C | Emerson | | 19709 Wendy Dr | Middleburg Heights | 44130 | 8/19/04 | |
| Tina | N | Hoon | | 6658 Stoney Creek Dr | North Royalton | 44133 | 8/19/04 | |
| Estra | M | Warren | | 6484 State Rd D-4 | Parma | 44134 | 8/19/04 | |
| David | M | Orges | | 6900 State Rd 120 | Parma | 44134 | 8/19/04 | |
| Phil | M | Reed | II | 11335 Central Park Blvd UP | Olmsted Falls | 44138 | 8/19/04 | |
| Randy | L | Robinson | | 25597 Locust Dr | Olmsted Falls | 44138 | 8/19/04 | |
| Alanna | M | Foglietti | | 6625 Chagrin River Rd | Solon | 44139 | 8/19/04 | |
| Steve | | Thompson | | 1990 Millard Dr | Bay Village | 44140 | 8/19/04 | |
| Heidi | V | McGuire | | 3265 Millard Dr | Bay Village | 44140 | 8/19/04 | |
| Merleen | M | Franks | | 3272 Millard Dr #5 | Bay Village | 44140 | 8/19/04 | |
| Joseph | L | Turnage | | 5988 Engle Rd | Brook Park | 44142 | 8/20/04 | |
| Bertha | | Hall | | 1917 Longspur Rd | Highland Heights | 44143 | 8/19/04 | |
| Kenneth | | Pope | | 629 Locke Dr | Highland Heights | 44143 | 8/19/04 | |
| Mark | D | Williams | | 26463 Solon Rd Club 111 | Oakwood | 44146 | 8/19/04 | |
| Tamara | D | Ketton | | 9242 Stafford Dr | Strongsville | 44149 | 8/19/04 | |
| Tamara | D | Ketton | | 9424 Stafford Dr | Strongsville | 44149 | 8/19/04 | |
| Demetrius | | Blackwell | | 1717 W 58th St | Cleveland | 44402 | 8/19/04 | |
| David | A | King | | 5960 Engle Rd | Brook Park | 4224-2136 | 8/19/04 | |

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|-------------|---|------------|--------------------------|---------------|------------|---------|--|
| Daniel | | Harmon | 889 Arden Ave | Berea | 44017-1168 | 8/19/04 | |
| Ioshua | S | Landis | 244 Barbary Dr | Berea | 44017-1206 | 8/19/04 | |
| Yelena | | Gagnepw | 188 Edgewood Dr UP | Berea | 44017-1412 | 8/19/04 | |
| Alison | D | Dejesus | 654 Front St | Berea | 44017-1607 | 8/19/04 | |
| Michelle | A | Erdman | 80 Emerson Dr | Berea | 44017-1676 | 8/19/04 | |
| Nicole | Y | Hanible | 22 W 5th Ave Apt C1 | Berea | 44017-1740 | 8/19/04 | |
| John | L | Feldman | 375 Front St Apt A8 | Berea | 44017-1742 | 8/20/04 | |
| James | L | Boles | 287 W Bagley Rd | Berea | 44017-1865 | 8/19/04 | |
| May | C | Dumont | 210 Mulberry St Apt 22 | Berea | 44017-1869 | 8/20/04 | |
| Eddie | J | Wright | 100 Front St P | Berea | 44017-1913 | 8/19/04 | |
| Christopher | R | Fouser | 205 Front St | Berea | 44017-1921 | 8/19/04 | |
| Lauren | T | Cleveland | 616 Falls Rd | Chagrin Falls | 44022-2561 | 8/19/04 | |
| Christopher | L | Cessaciti | 63 E Summit St | Chagrin Falls | 44022-2709 | 8/20/04 | |
| Edward | W | Smith | 196 Vincent St | Chagrin Falls | 44022-2951 | 8/20/04 | |
| Robin | | Carter | 38 S Franklin St | Chagrin Falls | 44022-3213 | 8/19/04 | |
| Ildred | Y | Lee | 2859 Community Dr | Chagrin Falls | 44022-6678 | 8/19/04 | |
| Paul | W | Yowell | 7926 Madison Ave | Cleveland | 44102-1058 | 8/20/04 | |
| Mark | | White | 1333 W 114th St | Cleveland | 44102-1307 | 8/19/04 | |
| Juan | A | Mays | 1355 W 116th St | Cleveland | 44102-1329 | 8/19/04 | |
| Mohan | | Vasa | 1361 W 114th St | Cleveland | 44102-1353 | 8/19/04 | |
| Dustin | M | Small | 1819 W 45th St | Cleveland | 44102-1450 | 8/19/04 | |
| Jason | S | Briscutine | 11011 Clifton Blvd | Cleveland | 44102-1532 | 8/20/04 | |
| Erin | M | Peyor | 10710 Clifton Blvd | Cleveland | 44102-1547 | 8/19/04 | |
| Christopher | H | Antonini | 10710 Clifton Blvd 1 | Cleveland | 44102-1547 | 8/19/04 | |
| Keith | R | Jewell | 1380 W 111th St | Cleveland | 44102-1552 | 8/19/04 | |
| Juanita | R | Fudge | 1380 W 111th St Apt 201 | Cleveland | 44102-1552 | 8/19/04 | |
| Dante | M | Smith | 1220 W 104th St Apt 303 | Cleveland | 44102-1557 | 8/19/04 | |
| Charla | | Malloy | 1309 W 103rd St | Cleveland | 44102-1622 | 8/19/04 | |
| Randall | T | Hunt | 1323 W 95th St | Cleveland | 44102-1712 | 8/19/04 | |
| Karina | L | Hope | 1440 W 85th St UP | Cleveland | 44102-1820 | 8/20/04 | |
| Dennis | L | Brown | 1448 W 85th St | Cleveland | 44102-1820 | 8/20/04 | |
| James | | Washington | 1375 W 87th St UP | Cleveland | 44102-1823 | 8/20/04 | |
| Janine | M | Douglas | 1316 W 87th St | Cleveland | 44102-1824 | 8/19/04 | |
| Henry | J | Burny | 1314 W 93rd St | Cleveland | 44102-1836 | 8/20/04 | |
| Samantha | L | Bunding | 1453 W 85th St Apt 6 | Cleveland | 44102-1839 | 8/20/04 | |
| Melissa | L | Burnett | 9505 Detroit Ave 905 | Cleveland | 44102-1851 | 8/20/04 | |
| Jason | | Vicario | 9520 Detroit Ave Apt 202 | Cleveland | 44102-1869 | 8/19/04 | |

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| Muhammad | A | Hafiz | | 9520 Detroit Ave Apt 1013 | Cleveland | 44102-1873 | 8/19/04 | |
| Charlesine | E | Green | | 1361 W 91st St Apt 10 | Cleveland | 44102-1882 | 8/20/04 | |
| Myron | D | Watts | | 1360 W 80th St | Cleveland | 44102-1901 | 8/20/04 | |
| Jason | L | Weaver | | 1339 W 83rd St 12 | Cleveland | 44102-1905 | 8/19/04 | |
| Jason | | Williams | | 1394 W 83rd St | Cleveland | 44102-1906 | 8/19/04 | |
| James | C | Luster | | 1372 W 83rd St | Cleveland | 44102-1941 | 8/20/04 | |
| David | | Raynos | | 1359 W 83rd St | Cleveland | 44102-1945 | 8/20/04 | |
| Maurice | A | Davis | Jr | 1359 W 83rd St 15 | Cleveland | 44102-1945 | 8/20/04 | |
| Marlena | M | Malcolm | | 8107 Lake Ave | Cleveland | 44102-1956 | 8/19/04 | |
| Kim | | Perchinski | | 8013 Lake Ave | Cleveland | 44102-1958 | 8/19/04 | |
| Edward | L | Hill | | 1378 W 83rd St | Cleveland | 44102-1965 | 8/19/04 | |
| Linda | M | Hayes | | 7405 Herman Ave | Cleveland | 44102-2038 | 8/19/04 | |
| Estanislao | T | Ortiz | | 1331 W 70th St | Cleveland | 44102-2059 | 8/19/04 | |
| Kevin | R | Dika | II | 1265 W 58th St | Cleveland | 44102-2145 | 8/19/04 | |
| Anthony | D | Thompson | | 11410 Detroit Ave | Cleveland | 44102-2316 | 8/19/04 | |
| Kenneth | J | Humphries | Jr | 1419 W 112th St A | Cleveland | 44102-2347 | 8/19/04 | |
| Kenec | | Johnson | | 1405 W 114th St | Cleveland | 44102-2362 | 8/19/04 | |
| Edward | | Ondreff | | 1472 W 112th St | Cleveland | 44102-2364 | 8/20/04 | |
| Andre | R | Foster | | 11210 Detroit Ave | Cleveland | 44102-2406 | 8/19/04 | |
| Laroyal | J | Underwood | | 1417 W 107th St Apt 2 | Cleveland | 44102-2419 | 8/20/04 | |
| Roy | C | Soto | | 11118 Detroit Ave Apt 304 | Cleveland | 44102-2439 | 8/19/04 | |
| Steven | | Mitchell | | 11110 Detroit Ave | Cleveland | 44102-2449 | 8/19/04 | |
| Jessica | M | Edwards | | 8805 Madison Ave Apt 4 | Cleveland | 44102-2751 | 8/19/04 | |
| Aaron | | Martinelli | | 8206 Detroit Ave | Cleveland | 44102-2843 | 8/20/04 | |
| Anna | L | Williams | | 8003 Detroit Ave | Cleveland | 44102-2854 | 8/19/04 | |
| Tito | J | Ruiz | | 1452 W 75th St | Cleveland | 44102-2902 | 8/19/04 | |
| Michelle | A | Moran | | 6514 W Clinton Ave | Cleveland | 44102-2906 | 8/19/04 | |
| Nickie | | Young | | 6915 Franklin Blvd 2 | Cleveland | 44102-2917 | 8/19/04 | |
| Nickie | M | Young | | 6915 Franklin Blvd 2 | Cleveland | 44102-2917 | 8/19/04 | |
| Charles | N | Mixon | | 1978 W 75th St | Cleveland | 44102-2942 | 8/20/04 | |
| Salina | | Jones | | 7409 Franklin Blvd Apt 2 | Cleveland | 44102-2965 | 8/19/04 | |
| Miguel | | Saucedo | Jr | 1435 W 57th St | Cleveland | 44102-3043 | 8/19/04 | |
| Bennett | E | Fox | | 6009 Bridge Ave | Cleveland | 44102-3118 | 8/20/04 | |
| Christopher | L | Lawson | | 1812 W 57th St | Cleveland | 44102-3209 | 8/19/04 | |
| Cedric | B | Jackson | St | 1812 W 57th St | Cleveland | 44102-3209 | 8/19/04 | |
| Tito | | Cancy | | 1908 W 57th St | Cleveland | 44102-3213 | 8/19/04 | |
| Edilberto | | Morals | | 5516 Lorain Ave | Cleveland | 44102-3236 | 8/19/04 | |

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| ason | | Jones | 5309 Bridge Ave | Cleveland | 44102-3347 | 8/19/04 | |
| Florida | S | Mejia | 4805 Lorain Ave B | Cleveland | 44102-3351 | 8/19/04 | |
| Ricardo | L | Glen | 1453 W 48th St 3 | Cleveland | 44102-3359 | 8/19/04 | |
| Jonathan | D | Williams | 1949 W 52nd St UP | Cleveland | 44102-3366 | 8/19/04 | |
| Edmanuel | | Sosa | 4828 Lorain Ave | Cleveland | 44102-3376 | 8/20/04 | |
| Carlos | O | Perez | 4719 Bridge Ave | Cleveland | 44102-3423 | 8/19/04 | |
| Sam | T | Thomas | 1958 W 48th St | Cleveland | 44102-3437 | 8/19/04 | |
| Trace | | Johnson | 1947 W 47th St | Cleveland | 44102-3454 | 8/19/04 | |
| Dominique | S | King | 1947 W 47th St Apt 3 | Cleveland | 44102-3454 | 8/19/04 | |
| Donna | | Mars | 1947 W 47th St Apt 5 | Cleveland | 44102-3454 | 8/19/04 | |
| Johnnie | B | Smith | 2023 W 105th St Apt 1 | Cleveland | 44102-3553 | 8/19/04 | |
| Samuel | P | Thomas | 2036 W 98th St | Cleveland | 44102-3602 | 8/19/04 | |
| James | | Bonner | 3201 W 58th St | Cleveland | 44102-3607 | 8/20/04 | |
| Linas | | Klimavicius | 2075 W 98th St | Cleveland | 44102-3650 | 8/19/04 | |
| Deandre | | Smith | 2087 W 98th St | Cleveland | 44102-3653 | 8/19/04 | |
| Franklin | R | Nolan | 7006 Detroit Ave | Cleveland | 44102-3656 | 8/19/04 | |
| James | W | Robinson | 2104 W 93rd St | Cleveland | 44102-3704 | 8/20/04 | |
| Francisca | A | Robinson | 2104 W 93rd St | Cleveland | 44102-3704 | 8/20/04 | |
| Amy | | Dingess | 2118 W 93rd St | Cleveland | 44102-3704 | 8/19/04 | |
| Adrian | | Goins | 2126 W 96th St | Cleveland | 44102-3708 | 8/20/04 | |
| Tiffany | S | Davis | 9711 Laender Ave | Cleveland | 44102-3725 | 8/19/04 | |
| Kevin | | O'Neal | 2130 W 95th St | Cleveland | 44102-3730 | 8/19/04 | |
| Michelle | M | McDowell | 2010 W 95th St Apt 6 | Cleveland | 44102-3753 | 8/19/04 | |
| Yas,om | | Abais halo | 2170 W 98th St | Cleveland | 44102-3758 | 8/20/04 | |
| Felicia | N | Murrell | 2016 W 89th St | Cleveland | 44102-3818 | 8/19/04 | |
| Jamie | L | Robidoux | 8704 Platten Ave | Cleveland | 44102-3829 | 8/19/04 | |
| William | | Shannon | 6708 Wakefield Ave | Cleveland | 44102-3954 | 8/19/04 | |
| Paul | | Red | 7106 Madison | Cleveland | 44102-4044 | 8/19/04 | |
| Milagros | | Caban | 2178 W 80th St | Cleveland | 44102-4159 | 8/19/04 | |
| Herman | L | Lewis | 2042 W 73rd St #DN | Cleveland | 44102-4186 | 8/20/04 | |
| Retia | | Jordan | 7414 Colgate Ave | Cleveland | 44102-4229 | 8/19/04 | |
| Anthony | G | Quanda | 7466 Colgate Ave 3 | Cleveland | 44102-4229 | 8/19/04 | |
| Dollie | M | Wimmer | 7616 Lorain Ave | Cleveland | 44102-4250 | 8/19/04 | |
| Brandon | D | Bates | 2108 W 73rd St Apt 2 | Cleveland | 44102-4262 | 8/19/04 | |
| Danyell | N | Lockhart | 3256 W 98th St | Cleveland | 44102-4602 | 8/19/04 | |
| Kim | S | Fuley | 3431 W 98th St | Cleveland | 44102-4605 | 8/20/04 | |
| Tina | M | Adkins | 3236 W 99th St | Cleveland | 44102-4610 | 8/19/04 | |

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| Theodore | | Pickett | | 9712 Almia Ave | Cleveland | 44102-4708 | 8/19/04 | |
| Marguira | | Johnson | | 3549 W 97th St | Cleveland | 44102-4728 | 8/20/04 | |
| Wannell | | Howze | | 3127 W 88th St | Cleveland | 44102-4801 | 8/20/04 | |
| Shervin | | Scott | | 3197 W 90th St 2 | Cleveland | 44102-4805 | 8/19/04 | |
| Mabel | | Johnson | | 3222 W 90th St | Cleveland | 44102-4808 | 8/19/04 | |
| Latoya | Q | James | | 3233 W 94th St | Cleveland | 44102-4815 | 8/19/04 | |
| Jeffrey | A | Scamardo | | 3481 W 94th St | Cleveland | 44102-4841 | 8/19/04 | |
| Aja | R | Tisby | | 9006 Denison Ave | Cleveland | 44102-4847 | 8/19/04 | |
| Angel | | Mercardo | | 3255 W 86th St | Cleveland | 44102-4940 | 8/19/04 | |
| Jose | | Rodriguez | Jr | 3210 W 73rd St | Cleveland | 44102-5213 | 8/20/04 | |
| John | L | Prim | | 7101 Clark Ave | Cleveland | 44102-5224 | 8/20/04 | |
| Minna | E | Melendez | | 3566 W 63rd St | Cleveland | 44102-5408 | 8/20/04 | |
| Jennifer | L | Shamblin | | 3391 W 60th St | Cleveland | 44102-5528 | 8/19/04 | |
| Sheryl | A | Nageotte | | 3478 W 63rd St | Cleveland | 44102-5559 | 8/19/04 | |
| Jose | | Colon | | 3124 W 58th St | Cleveland | 44102-5606 | 8/20/04 | |
| Bill | | Wilson | | 3154 W 61st St | Cleveland | 44102-5612 | 8/19/04 | |
| Pamela | S | Boggs | | 3461 W 58th St | Cleveland | 44102-5637 | 8/19/04 | |
| Rosa | E | Colon | | 3485 W 58th St | Cleveland | 44102-5637 | 8/19/04 | |
| Alberto | | Rodriguez | | 3351 W 59th Pl | Cleveland | 44102-5642 | 8/19/04 | |
| Jason | M | Hagan | | 3357 W 59th Pl | Cleveland | 44102-5642 | 8/19/04 | |
| Dina | | Yonko | | 3370 W 59th Pl | Cleveland | 44102-5643 | 8/19/04 | |
| Jeffrey | | Braun | | 3275 W 58th St | Cleveland | 44102-5657 | 8/19/04 | |
| Sylvette | M | Gonzalez | | 3501 W 59th St | Cleveland | 44102-5667 | 8/19/04 | |
| Craig | A | Pearce | | 3115 W 58th St UP | Cleveland | 44102-5671 | 8/19/04 | |
| Reginald | M | Whitson | | 3288 W 58th St 212 | Cleveland | 44102-5677 | 8/19/04 | |
| Nancy | C | Melcher | | 3401 W 56th St | Cleveland | 44102-5719 | 8/19/04 | |
| Ranasha | L | Johnson | | 3443 W 56th St | Cleveland | 44102-5719 | 8/19/04 | |
| Jonathan | O | Snyder | | 3406 W 56th St | Cleveland | 44102-5720 | 8/19/04 | |
| Natalie | | Gomez | | 3462 W 54th St | Cleveland | 44102-5743 | 8/20/04 | |
| Erica | E | Rose | | 3256 W 56th St UP | Cleveland | 44102-5747 | 8/19/04 | |
| Cas | | Heard | | 3231 W 54th St #2 | Cleveland | 44102-5758 | 8/19/04 | |
| Dean | M | Furcello | | 3199 W 58th St UP | Cleveland | 44102-5760 | 8/19/04 | |
| Manual | D | Rodriguez | | 3287 W 56th St | Cleveland | 44102-5761 | 8/19/04 | |
| Rosa | K | Hill | | 3161 W 50th St | Cleveland | 44102-5835 | 8/19/04 | |
| Emily | A | Stewart | | 3201 W 52nd St | Cleveland | 44102-5881 | 8/19/04 | |
| Karen | S | Jones | | 3153 W 48th St | Cleveland | 44102-5931 | 8/19/04 | |
| Albert | C | Davis | Jr | 3286 W 48th St | Cleveland | 44102-5934 | 8/19/04 | |

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| Clifton | R | Johnson | | 3206 W 46th St | Cleveland | 44102-5969 | 8/19/04 | |
| Mation | L | Marshall | | 11580 Lake Ave | Cleveland | 44102-6108 | 8/19/04 | |
| Julia | A | Marshall | | 11580 Lake Ave | Cleveland | 44102-6108 | 8/19/04 | |
| Daniel | J | Guido | | 1456 W 85th St | Cleveland | 44102-6602 | 8/20/04 | |
| James | H | Lipscomb | | 1188 Norwood Rd | Cleveland | 44103-1588 | 8/19/04 | |
| Zsahneiscia | C | Jirt | | 1095 Addison Rd | Cleveland | 44103-1646 | 8/19/04 | |
| Jeff | | Hall | | 1217 E 71st St 2 | Cleveland | 44103-1936 | 8/19/04 | |
| Percy | | Clark | | 7610 Cornelia Ave | Cleveland | 44103-2014 | 8/19/04 | |
| Jennifer | A | Moore | | 8014 Korman Ave | Cleveland | 44103-2138 | 8/19/04 | |
| Michael | W | Hochschild | | 15757 Mandalay Ave DN | Cleveland | 4410-3214 | 8/19/04 | |
| Donnell | F | Younger | | 1033 E 79th St | Cleveland | 44103-2169 | 8/19/04 | |
| Henry | D | Booker | | 8110 Decker Ave | Cleveland | 44103-2998 | 8/20/04 | |
| Edwin | M | Gu | | 7810 Cedar Ave Apt 3 | Cleveland | 44103-4964 | 8/19/04 | |
| Diane | | Harris | | 2478 E 83rd St #603 | Cleveland | 44104-2204 | 8/19/04 | |
| Terence | R | Grayner | | 9619 Steinway Ave | Cleveland | 44104-3465 | 8/20/04 | |
| Armell | | Wright | | 10506 Grandview Ave | Cleveland | 44104-3501 | 8/19/04 | |
| Arcance | E | Wright | | 10506 Grandview Ave | Cleveland | 44104-3521 | 8/19/04 | |
| Keyana | N | Burton | | 10309 Hulda Ave | Cleveland | 44104-3538 | 8/19/04 | |
| Demetrius | | Vaden | | 10309 Hulda Ave | Cleveland | 44104-3538 | 8/20/04 | |
| Sheryl | R | Cool | | 10301 Shale Ave | Cleveland | 44104-3613 | 8/19/04 | |
| Dwayne | | Hudson | | 10406 Buckeye Rd | Cleveland | 44104-3727 | 8/19/04 | |
| Cynthia | | Fantoy | | 10310 Shaker Blvd | Cleveland | 44104-3778 | 8/19/04 | |
| Demetrius | J | Campbell | | 9613 Heath Ave 1 | Cleveland | 44104-5515 | 8/19/04 | |
| Jason | A | Ettinger | | 3667 E 57th St | Cleveland | 44105-1133 | 8/20/04 | |
| Melisa | D | Burress | | 5608 Mound Ave | Cleveland | 44105-1168 | 8/19/04 | |
| Trameka | A | Mitchell | | 3725 E 65th St | Cleveland | 44105-1254 | 8/20/04 | |
| Tommy | O | Hobbs | III | 3715 E 61st St Apt 3 | Cleveland | 44105-1266 | 8/20/04 | |
| Chad | | Richards | | 3708 E 63rd St | Cleveland | 44105-1292 | 8/20/04 | |
| James | W | Robinson | St | 3688 E 63rd St Apt 2 | Cleveland | 44105-1297 | 8/19/04 | |
| Kenyn | S | Zaid | | 6603 Union Ave | Cleveland | 44105-1321 | 8/19/04 | |
| Tequita | S | Duke | | 7209 Union Ave | Cleveland | 44105-1451 | 8/19/04 | |
| Tabrea | Q | Roberson | | 6518 Chambers Ave Apt 5 | Cleveland | 44105-1486 | 8/19/04 | |
| Michael | | Wright | | 6518 Chambers Ave Apt 5 | Cleveland | 44105-1486 | 8/19/04 | |
| Michael | | Wright | | 6518 Chambers Ave Apt 5 | Cleveland | 44105-1486 | 8/19/04 | |
| Airne | B | Kennedy | | 3545 E 81st St | Cleveland | 44105-1525 | 8/20/04 | |
| Darnell | D | Taylor | | 9901 Union Ave 3 | Cleveland | 44105-1759 | 8/20/04 | |
| Yalonda | | Moddy | | 3534 E 108th St | Cleveland | 44105-1820 | 8/19/04 | |

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|-----------|---|----------------|----|-----------------------|-----------|------------|---------|--|
| Kirk | L | Jones | | 3556 E 118th St | Cleveland | 44105-1862 | 8/20/04 | |
| Patrice | N | Henderson | | 3556 E 118th St | Cleveland | 44105-1862 | 8/20/04 | |
| Isbell | N | Abdur-Razzaque | | 12310 Benham Ave | Cleveland | 44105-1912 | 8/20/04 | |
| James | D | Brown | | 9510 Anderson Ave | Cleveland | 44105-2206 | 8/20/04 | |
| Lowanda | D | McMillan | | 9602 Orleaus Ave | Cleveland | 44105-2228 | 8/20/04 | |
| Marshall | G | Fairfax | Jr | 9420 Dunlap Ave | Cleveland | 44105-2331 | 8/19/04 | |
| Lawrance | | Pennyman | | 3578 E 106th St | Cleveland | 44105-2418 | 8/20/04 | |
| Kim | T | Starts | | 10512 Sandusky Ave UP | Cleveland | 44105-2439 | 8/19/04 | |
| James | H | Johnson | | 3696 E 110th St | Cleveland | 44105-2468 | 8/19/04 | |
| Wanda | M | Blair | | 3617 E 116th St | Cleveland | 44105-2511 | 8/20/04 | |
| Steve | | Smith | | 3632 E 117th St | Cleveland | 44105-2517 | 8/20/04 | |
| Gerard | | Macklin | | 3652 E 117th St | Cleveland | 44105-2523 | 8/20/04 | |
| Earnest | | Brooks | | 11717 Farringdon Ave | Cleveland | 44105-2532 | 8/20/04 | |
| Kenneth | R | Benton | | 11717 Farringdon Ave | Cleveland | 44105-2532 | 8/20/04 | |
| Monique | A | Simpson | | 11718 Crave Ave | Cleveland | 44105-2577 | 8/20/04 | |
| Ioshua | | Hopkins | | 3607 E 117th St Apt 2 | Cleveland | 44105-2588 | 8/19/04 | |
| Vince | | Butler | | 12718 Holborn Ave | Cleveland | 44105-2625 | 8/20/04 | |
| Anthony | D | Oden | | 12401 Craven Ave | Cleveland | 44105-2647 | 8/20/04 | |
| Louis | A | Marich | | 3847 E 50th St UP | Cleveland | 44105-3311 | 8/19/04 | |
| Mike | G | Brown | | 3812 E 54th St | Cleveland | 44105-3350 | 8/20/04 | |
| Jessica | M | Bennett | | 7424 Ottawa Rd | Cleveland | 44105-3823 | 8/19/04 | |
| Larry | I | Eskridge | | 8415 Broadway Ave | Cleveland | 44105-3932 | 8/20/04 | |
| Claude | | Amburgey | Jr | 8415 Broadway Ave | Cleveland | 44105-3932 | 8/20/04 | |
| Lavelle | A | Gaddis | | 8415 Broadway Ave | Cleveland | 44105-3932 | 8/20/04 | |
| Jerome | P | Owens | | 8415 Broadway Ave | Cleveland | 44105-3932 | 8/20/04 | |
| Teresa | D | Gartwright | | 1835 Harvard Ave #314 | Cleveland | 44105-3938 | 8/19/04 | |
| Ronda | M | Thaxton | | 7835 Harvard Ave | Cleveland | 44105-3938 | 8/19/04 | |
| Antoine | D | Williams | | 9617 Elizabeth Ave | Cleveland | 44105-4007 | 8/20/04 | |
| Theresa | | Castleberry | | 9806 Elizabeth Ave UP | Cleveland | 44105-4012 | 8/20/04 | |
| Gary | L | Dancey | | 3899 E 97th St | Cleveland | 44105-4053 | 8/20/04 | |
| Terry | | Little | | 10607 Nelson Ave | Cleveland | 44105-4254 | 8/19/04 | |
| Antonio | M | Lewis | | 11505 Dove Ave UP | Cleveland | 44105-4320 | 8/20/04 | |
| Nafisah | A | Zahir | | 4015 E 121st St | Cleveland | 44105-4552 | 8/20/04 | |
| Darryl | | Moore | | 13510 Benwood Ave | Cleveland | 44105-4610 | 8/19/04 | |
| Carisalle | L | Robinson | | 13601 Benwood Ave #3 | Cleveland | 44105-4611 | 8/20/04 | |
| Delbert | C | Moore | | 13908 Durkee Ave | Cleveland | 44105-4635 | 8/19/04 | |
| James | P | Poor | | 4080 E 127th St | Cleveland | 44105-4738 | 8/20/04 | |

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|-----------|---|----------|----------------------|------------------|------------|---------|--|
| Sean | | Boyd | 3937 E 53rd St | Newburgh Heights | 44105-4846 | 8/20/04 | |
| Devon | G | Island | 4073 E 76th St | Cleveland | 44105-5057 | 8/19/04 | |
| Jeannette | M | Ciganko | 9205 Harvard Ave | Cleveland | 44105-5274 | 8/19/04 | |
| Henry | | Lewis | 4125 E 110th St | Cleveland | 44105-5324 | 8/19/04 | |
| Sharmaine | M | Mathews | 4110 E 123rd St DN | Cleveland | 44105-5413 | 8/20/04 | |
| Shah | | Turstone | 13904 Miles Ave UP | Cleveland | 44105-5533 | 8/20/04 | |
| Tom | | Roberts | 12604 Miles Ave 3 | Cleveland | 44105-5539 | 8/20/04 | |
| Terrence | | Rose | 8215 Force Ave | Cleveland | 44105-5815 | 8/20/04 | |
| Jennifer | | Havran | 8104 Maryland Ave DN | Cleveland | 44105-5938 | 8/19/04 | |
| Desmond | | Apples | 11710 Robertson Ave | Cleveland | 44105-6223 | 8/19/04 | |
| Michael | T | Schade | 4230 E 131st St | Cleveland | 44105-6350 | 8/19/04 | |
| Jodi | A | Love | 7716 Bancroft Ave UP | Cleveland | 44105-6507 | 8/20/04 | |
| Dana | M | Smith | 13695 S Parkway Dr | Garfield Heights | 44105-6837 | 8/19/04 | |
| Steven | O | Smith | 4389 E 131st St UP | Garfield Heights | 44105-6945 | 8/19/04 | |
| Terese | M | Gregg | 3907 E 71st | Cleveland | 44105-7310 | 8/19/04 | |
| Marino | | Phillips | 1425 E 85th St | Cleveland | 44106-1003 | 8/19/04 | |
| Paul | L | Finley | 1397 E 93rd St | Cleveland | 44106-1005 | 8/19/04 | |
| Robert | | Ferguson | 1416 E 89th St | Cleveland | 44106-1026 | 8/19/04 | |
| Ken | D | Jackson | 1360 E 90th St | Cleveland | 44106-1028 | 8/19/04 | |
| Patrisio | B | Ortiz | 1361 E 91st St | Cleveland | 44106-1031 | 8/19/04 | |
| Adrian | A | Tyes | 1482 E 106th St | Cleveland | 44106-1105 | 8/19/04 | |
| Jerry | | Anthony | 1457 E 105th St | Cleveland | 44106-1137 | 8/19/04 | |
| Leonard | | Harris | 1357 E 105th St | Cleveland | 44106-1139 | 8/19/04 | |
| Diana | | Wallace | 10716 Lee Ave | Cleveland | 44106-1231 | 8/19/04 | |
| Debbie | | Foster | 10915 Orville Ave | Cleveland | 44106-1244 | 8/19/04 | |
| Katy | | Foster | 10915 Orville Ave | Cleveland | 44106-1244 | 8/19/04 | |
| Darlene | | Jones | 10707 Lee Ave Apt 4 | Cleveland | 44106-1256 | 8/19/04 | |
| Tamiko | Y | Patris | 1323 E 114th St | Cleveland | 44106-1323 | 8/19/04 | |
| Tina | T | Russell | 1344 E 123rd St | Cleveland | 44106-1408 | 8/19/04 | |
| James | | Johnson | 1364 E 123rd St | Cleveland | 44106-1408 | 8/19/04 | |
| James | | Spiest | 1364 E 123rd St | Cleveland | 44106-1408 | 8/19/04 | |
| Jonathan | | Mitz | 1321 Lakeview Rd | Cleveland | 44106-1427 | 8/19/04 | |
| Damon | L | Beal | 1477 E 116th St | Cleveland | 44106-1451 | 8/19/04 | |
| Lashawn | J | Harris | 1390 Lakeview Rd | Cleveland | 44106-1470 | 8/19/04 | |
| Deant | P | Booker | 1379 E 120th St | Cleveland | 44106-1477 | 8/19/04 | |
| Deonte | P | Booker | 1379 E 120th St | Cleveland | 44106-1477 | 8/19/04 | |
| Lontar | C | Brock | 1379 E 120th St 4 | Cleveland | 44106-1477 | 8/19/04 | |

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| Diane | Y | Smoot | | 11706 Beulah Ave | Cleveland | 44106-1480 | 8/19/04 | |
| Ronnie | | Dean | | 1673 E 90th St | Cleveland | 44106-1504 | 8/19/04 | |
| Brent | A | Fruge | | 9001 Hough Ave | Cleveland | 44106-1506 | 8/19/04 | |
| Veronica | P | Mansion | | 9231 Hough Ave 1 | Cleveland | 44106-1586 | 8/19/04 | |
| Wyeia | S | Walter | | 9410 Hough Ave | Cleveland | 44106-1599 | 8/19/04 | |
| Andrew | L | Dunn | | 11021 East Blvd | Cleveland | 44106-1703 | 8/19/04 | |
| Iason | A | Yoh | | 1906 E 120th St | Cleveland | 44106-1979 | 8/19/04 | |
| Jimmy | P | Mason | | 1905 E 89th St | Cleveland | 44106-2007 | 8/19/04 | |
| Gregory | | Hooper | | 1905 E 89th St | Cleveland | 44106-2007 | 8/19/04 | |
| Alisha | D | Lindsey | | 1905 E 89th St | Cleveland | 44106-2007 | 8/19/04 | |
| Aaron | E | Brown | | 1814 E 85th St | Cleveland | 44106-2014 | 8/19/04 | |
| Chavaugan | D | Copeland | | 1819 E 86th St | Cleveland | 44106-2018 | 8/19/04 | |
| Joseph | D | James | | 1859 E 86th St | Cleveland | 44106-2018 | 8/19/04 | |
| Demetrius | G | Johnson | | 1831 E 87th St | Cleveland | 44106-2024 | 8/19/04 | |
| Joy | A | Gibbs | | 1840 E 87th St | Cleveland | 44106-2025 | 8/19/04 | |
| Charles | G | Brown | | 1835 E 93rd St | Cleveland | 44106-2050 | 8/19/04 | |
| Ramon | D | Hanson | | 1871 E 93rd St | Cleveland | 44106-2050 | 8/19/04 | |
| Regina | M | Sims | | 1847 E 87th St | Cleveland | 44106-2091 | 8/19/04 | |
| Charles | | Warner | | 9813 Cedar Ave | Cleveland | 44106-2114 | 8/19/04 | |
| Monique | L | Giroux | | 2549 Kenilworth Rd Apt 2 | Cleveland Heights | 44106-2473 | 8/19/04 | |
| Malcom | S | Wightman | | 2759 Hampshire Rd Apt 4 | Cleveland Heights | 44106-2580 | 8/19/04 | |
| Carly | C | Bail | | 2757 Euclid Heights Blvd Apt 1 | Cleveland Heights | 44106-2839 | 8/19/04 | |
| Michael | D | Brown | | 9306 Cedar Ave | Cleveland | 44106-2938 | 8/19/04 | |
| Robert | T | Dickson | | 2043 E 86th St | Cleveland | 44106-2963 | 8/19/04 | |
| Bryan | E | Linkous | | 2284 Grandview Ave | Cleveland | 44106-3142 | 8/19/04 | |
| Niah | | Israel | | 2096 Surrey Rd Apt 3 | Cleveland Heights | 44106-3261 | 8/19/04 | |
| Tony | V | Taylor | | 2214 E 89th St | Cleveland | 44106-3402 | 8/19/04 | |
| Shayla | R | Norwood | | 2219 E 101st St | Cleveland | 44106-3579 | 8/19/04 | |
| John | | Roberts | | 1689 E 85th St | Cleveland | 44106-3707 | 8/19/04 | |
| Kernit | I | Abrams | | 1607 E 86th St | Cleveland | 44106-3713 | 8/19/04 | |
| Bonnie | | Hall | | 8615 Wade Park Ave | Cleveland | 44106-3738 | 8/19/04 | |
| Nick | J | Michrovicz | | 11435 Juniper Rd #420 | Cleveland | 44106-3976 | 8/20/04 | |
| Sally | | Wilson | | 1485 East Blvd | Cleveland | 44106-4012 | 8/19/04 | |
| Orlando | | Gaston | | 1487 East Blvd | Cleveland | 44106-4012 | 8/19/04 | |
| Robert | L | Hardnett | | 1675 Ansel Rd Apt 922 | Cleveland | 44106-4172 | 8/19/04 | |
| Laura | A | Flynn | | 10711 Arthur Ave | Cleveland | 44106-4213 | 8/19/04 | |
| Johnnie | B | Johnston | | 10719 Arthur Ave | Cleveland | 44106-4213 | 8/19/04 | |

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|------------|---|-------------|----------------------------|-----------|------------|---------|--|
| Laura | M | Jones | 10710 Arthur Ave | Cleveland | 44106-4214 | 8/19/04 | |
| Cassandra | | Samms | 10801 Arthur Ave | Cleveland | 44106-4215 | 8/19/04 | |
| Matt | P | Wald | 1720 E 116th Pl Apt 11 | Cleveland | 44106-4330 | 8/19/04 | |
| Byron | A | Hitchcock | 1720 E 116th Pl | Cleveland | 44106-4331 | 8/19/04 | |
| Nicole | M | Moore | 8717 Kenmore Ave | Cleveland | 44106-4509 | 8/19/04 | |
| Tenika | I | Tucker | 8618 Meridian Ave | Cleveland | 44106-4515 | 8/19/04 | |
| Charles | | Slapak | 2190 Ambleside Dr F6036 | Cleveland | 44106-4633 | 8/19/04 | |
| Michelle | | Thomas | 9360 Amesbury Ave | Cleveland | 44106-4801 | 8/19/04 | |
| Cleius | L | Williams | 1779 E 89th St Apt 3 | Cleveland | 44106-4808 | 8/19/04 | |
| William | D | Philpott | 1838 E 90th St | Cleveland | 44106-4852 | 8/19/04 | |
| Tracie | M | Morris | 1832 E 90th St | Cleveland | 44106-4853 | 8/19/04 | |
| Emma | | Williams | 1832 E 90th St | Cleveland | 44106-4853 | 8/19/04 | |
| Michael | I | McCall | 1458 E 115th St | Cleveland | 44106-5301 | 8/19/04 | |
| Latonya | N | Spencer | 1458 E 115th St Apt 5 | Cleveland | 44106-5302 | 8/19/04 | |
| Erin | M | Shukart | 1964 E 126th St | Cleveland | 44106-5961 | 8/19/04 | |
| Angela | S | Ricotta | 253 Beech St | Berea | 44107-1209 | 8/19/04 | |
| Raymond | | Curry | 16101 Lake Ave | Lakewood | 44107-1247 | 8/19/04 | |
| Constance | T | Ludrosky | 12505 Edgewater Dr Apt 106 | Lakewood | 44107-1632 | 8/19/04 | |
| Chrissa | L | Perkins | 11820 Edgewater Dr Apt 510 | Lakewood | 44107-1793 | 8/19/04 | |
| Ann | G | Heidenreich | 11732 Lake Ave Apt 201 | Lakewood | 44107-2053 | 8/20/04 | |
| Eva | A | Hutter | 1211 Granger Ave | Lakewood | 44107-2218 | 8/20/04 | |
| Nicole | S | McVay | 1332 Webb Rd | Lakewood | 44107-2227 | 8/19/04 | |
| Fehmi | S | Daoud | 14703 Clifton Blvd | Lakewood | 44107-2521 | 8/20/04 | |
| Douglas | | Eisenbrown | 1317 Belle Ave | Lakewood | 44107-2679 | 8/20/04 | |
| Mark | D | Perdue | 1352 Lakewood Ave 1 | Lakewood | 44107-2848 | 8/20/04 | |
| Katie | M | Greene | 12816 Detroit Ave #1 | Lakewood | 44107-2854 | 8/19/04 | |
| Tabitha | A | Prisinzano | 11840 S Lane Dr Apt 7 | Lakewood | 44107-2927 | 8/20/04 | |
| Eric | D | Davis | 12410 Detroit Ave #2 | Lakewood | 44107-3013 | 8/19/04 | |
| Jeffrey | T | Harris | 1340 W Clifton Blvd 00 | Lakewood | 44107-3364 | 8/19/04 | |
| Halle | E | Page | 1441 Rockway Ave | Lakewood | 44107-3418 | 8/20/04 | |
| Jean | M | Pandoli | 1530 Mars Ave | Lakewood | 44107-3823 | 8/20/04 | |
| Jessica | L | Berry | 14212 Cedarwood Ave UP | Lakewood | 44107-4547 | 8/19/04 | |
| Angela | D | Raycheck | 1415 Wyandotte Ave 10 | Lakewood | 44107-4753 | 8/20/04 | |
| Bianca | | Rivera | 1446 Ridgewood Ave | Lakewood | 44107-5015 | 8/19/04 | |
| Antoinette | L | Bartste | 2104 Lark St #A | Lakewood | 44107-5298 | 8/20/04 | |
| Verdell | S | Benifeid | 2014 Morrison Ave Apt 3 | Lakewood | 44107-5748 | 8/20/04 | |
| Dana | | Sisk | 2020 Warren Rd | Lakewood | 44107-5841 | 8/19/04 | |

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| Jeffrey | E | Cechura | 2040 Richland Ave | Lakewood | 44107-6002 | 8/20/04 | |
| Dominique | M | Reminick | 2011 Bunts Rd 16 | Lakewood | 44107-6101 | 8/20/04 | |
| Tianno | A | Dozier | 1631 Newman Ave Apt 1 | Lakewood | 44107-7202 | 8/20/04 | |
| Ioshenna | | Johnson | 625 E 99th St | Cleveland | 44108-1213 | 8/20/04 | |
| Gregory | E | Simmons | 681 E 99th St | Cleveland | 44108-1213 | 8/20/04 | |
| Khaniedra | E | Ferguson | 723 E 99th St | Cleveland | 44108-1215 | 8/20/04 | |
| Mike | A | Johnson | 1332 W 93rd St | Cleveland | 44108-1226 | 8/20/04 | |
| Ioshua | M | Lynch | 710 E 91st St | Cleveland | 44108-1235 | 8/19/04 | |
| Darnell | M | Means | 762 E 92nd St | Cleveland | 44108-1239 | 8/19/04 | |
| Marvin | | Tuistone | 619 E 94th St | Cleveland | 44108-1244 | 8/20/04 | |
| Wydeell | J | Jordan | 688 E 96th St | Cleveland | 44108-1265 | 8/20/04 | |
| Angela | D | Shaw | 9005 Stewart Ave Apt 1 | Cleveland | 44108-1295 | 8/19/04 | |
| Quinchette | L | Wade | 10521 Glenville Ave UP | Cleveland | 44108-1315 | 8/20/04 | |
| Lucretia | D | McCalister | 668 E 101st St | Cleveland | 44108-1323 | 8/20/04 | |
| Rashawn | K | James | 672 E 101st St | Cleveland | 44108-1323 | 8/20/04 | |
| Daymon | J | Smith | 692 E 101st St | Cleveland | 44108-1323 | 8/20/04 | |
| Syvin | A | Foster | 692 E 101st St | Cleveland | 44108-1323 | 8/20/04 | |
| Daimonta | P | Washington | 648 E 102nd St | Cleveland | 44108-1327 | 8/19/04 | |
| Ariel | J | Wynn | 10320 Barrett Ave | Cleveland | 44108-1362 | 8/20/04 | |
| Michael | | Wilson | 586 E 105th St Apt 4 | Cleveland | 44108-1363 | 8/19/04 | |
| Mike | | Dawson | 569 E 102nd St | Cleveland | 44108-1370 | 8/19/04 | |
| Michael | | Dawson | 569 E 102nd St | Cleveland | 44108-1370 | 8/20/04 | |
| Terry | L | Hall | 593 E 101st St | Cleveland | 44108-1372 | 8/19/04 | |
| Tryone | L | Barboza | 634 E 102nd St | Cleveland | 44108-1382 | 8/19/04 | |
| Lamarr | J | Edwards | 643 E 101st St | Cleveland | 44108-1384 | 8/20/04 | |
| Mario | J | Edwards | 643 E 101st St Apt 1 | Cleveland | 44108-1384 | 8/19/04 | |
| Mario | D | Cole | 643 E 101st St Apt 1 | Cleveland | 44108-1384 | 8/19/04 | |
| Gabrielle | M | Carter | 527 E 110th St | Cleveland | 44108-1402 | 8/19/04 | |
| Deidre | M | Conley | 556 E 110th St | Cleveland | 44108-1403 | 8/19/04 | |
| Eva | B | Harris | 576 E 110th St | Cleveland | 44108-1403 | 8/19/04 | |
| Derrick | B | Dunnican | 527 E 117th St | Cleveland | 44108-1417 | 8/19/04 | |
| Monic | C | Jones | 425 E 114th St | Cleveland | 44108-1422 | 8/19/04 | |
| Paul | A | Nesbitt | 11202 Sellers Ave | Cleveland | 44108-1426 | 8/19/04 | |
| L.C. | | Bass | 541 E 108th St | Cleveland | 44108-1435 | 8/19/04 | |
| Taria | S | Thompson | 430 E 114th St UP | Cleveland | 44108-1470 | 8/19/04 | |
| Tony | P | Johnson | 561 E 114th St | Cleveland | 44108-1473 | 8/19/04 | |
| George | | Hunter | 468 E 117th St | Cleveland | 44108-1479 | 8/19/04 | |

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|-----------|---|----------|---------------------|-----------|------------|---------|--|
| Nichelle | V | Shelton | 565 E 117th St | Cleveland | 44108-1481 | 8/19/04 | |
| marcharie | O | Smith | 597 E 107th St | Cleveland | 44108-1489 | 8/19/04 | |
| Tamara | L | Hughes | 597 E 107th St | Cleveland | 44108-1489 | 8/19/04 | |
| Allen | P | Smith | 11708 Ablewhite Ave | Cleveland | 44108-1507 | 8/19/04 | |
| Trent | A | Gainer | 11607 Shadeland Ave | Cleveland | 44108-1546 | 8/19/04 | |
| David | A | Williams | 12012 Shadeland Ave | Cleveland | 44108-1554 | 8/19/04 | |
| Dequits | M | Dowdell | 336 Eddy Rd Apt 9 | Cleveland | 44108-1638 | 8/19/04 | |
| Jonathan | J | Carter | 353 E 123rd St UP | Cleveland | 44108-1701 | 8/19/04 | |
| Jamson | D | Jones | 363 E 123rd St | Cleveland | 44108-1701 | 8/19/04 | |
| Michael | J | Durroh | 351 E 124th St | Cleveland | 44108-1705 | 8/19/04 | |
| Tony | Q | Harden | 12424 Iowa Ave | Cleveland | 44108-1721 | 8/20/04 | |
| Pamela | | Hines | 12504 Locke Ave | Cleveland | 44108-1735 | 8/19/04 | |
| Denya | R | Gordon | 12613 Locke Ave | Cleveland | 44108-1736 | 8/19/04 | |
| Tonya | | Prait | 430 Arbor Rd | Cleveland | 44108-1759 | 8/19/04 | |
| Steven | | Toby | 430 Arbor Rd | Cleveland | 44108-1759 | 8/19/04 | |
| Anita | O | Prait | 430 Arbor Rd | Cleveland | 44108-1759 | 8/19/04 | |
| Rayshawn | O | Watson | 480 Cleveland Rd | Cleveland | 44108-1771 | 8/19/04 | |
| Floyd | J | Smith | 444 Cleveland Rd | Cleveland | 44108-1772 | 8/19/04 | |
| Tomiko | D | Tanke | 12504 Lancelot Ave | Cleveland | 44108-1827 | 8/19/04 | |
| Tamara | L | Ricker | 12602 Lancelot Ave | Cleveland | 44108-1829 | 8/19/04 | |
| Shayna | L | Willis | 12525 Vashit Ave | Cleveland | 44108-1832 | 8/19/04 | |
| Eric | I | Stanley | 13008 Austin Ave | Cleveland | 44108-2025 | 8/20/04 | |
| Victoria | E | Schmitt | 12714 Shaw Ave | Cleveland | 44108-2049 | 8/19/04 | |
| John | A | Denison | 771 E 102nd St | Cleveland | 44108-2237 | 8/20/04 | |
| herman | | Ciers | 652 E 106th St | Cleveland | 44108-2242 | 8/20/04 | |
| David | | Kennedy | 1234 Eddy Rd 1 | Cleveland | 44108-2308 | 8/19/04 | |
| King | G | Lawson | 941 Thornhill Dr | Cleveland | 44108-2315 | 8/19/04 | |
| Gregory | V | Yates | 654 E 115th St | Cleveland | 44108-2319 | 8/19/04 | |
| Shawn | S | Jackson | 589 E 120th St 4 | Cleveland | 44108-2347 | 8/19/04 | |
| Ianice | | Stephens | 638 E 120th St UO | Cleveland | 44108-2348 | 8/19/04 | |
| Jason | | DeLarge | 980 Eddy Rd | Cleveland | 44108-2360 | 8/19/04 | |
| Darnell | L | Harrison | 965 Eddy Rd UP | Cleveland | 44108-2361 | 8/19/04 | |
| Derek | G | Dorsey | 873 Thornhill Dr | Cleveland | 44108-2363 | 8/19/04 | |
| Yuset | L | Jones | 875 Thornhill Dr | Cleveland | 44108-2363 | 8/19/04 | |
| Mary | | Walker | 879 Eddy Rd | Cleveland | 44108-2381 | 8/19/04 | |
| Jerome | K | Simmons | 12716 Woodside Ave | Cleveland | 44108-2427 | 8/20/04 | |
| Chad | S | Brown | 640 E 125th St | Cleveland | 44108-2432 | 8/20/04 | |

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| David | | Wheeler | 615 E 128th St | Cleveland | 44108-2445 | 8/20/04 | |
| Robert | I | Clifford | 625 E 128th St Apt 3 | Cleveland | 44108-2445 | 8/20/04 | |
| Mike | S | Burton | 12643 Edmonston Ave | Cleveland | 44108-2515 | 8/19/04 | |
| Krystal | | Johnson | 12622 Edmonston Ave | Cleveland | 44108-2516 | 8/19/04 | |
| Mario | D | Rogers | 12827 Woodside Ave | Cleveland | 44108-2532 | 8/20/04 | |
| Robert | E | Olekson | 962 E 129th St | Cleveland | 44108-2540 | 8/20/04 | |
| Tony | B | Mitchel | 12634 Irvington Ave | Cleveland | 44108-2563 | 8/20/04 | |
| Derrick | P | Mayweather | 11415 Hopkins Ave | Cleveland | 44108-2629 | 8/20/04 | |
| Robert | | Gardard | 11602 Hopkins Ave | Cleveland | 44108-2634 | 8/20/04 | |
| John | | Renfree | 860 Lakeview Rd | Cleveland | 44108-2650 | 8/20/04 | |
| Steve | D | Peebles | 11208 Hopkins Ave | Cleveland | 44108-2675 | 8/20/04 | |
| Laura | | Garrett | 810 Parkwood Dr | Cleveland | 44108-2700 | 8/20/04 | |
| Dov | M | Dial | 10520 Bryant St | Cleveland | 44108-2704 | 8/19/04 | |
| Donna | R | Davis | 10801 Garfield Ave Up | Cleveland | 44108-2733 | 8/20/04 | |
| Michael | L | Johnson | 10602 Kimberley Ave | Cleveland | 44108-2740 | 8/20/04 | |
| Sade | E | Jackson | 9012 Kempton Ave | Cleveland | 44108-2933 | 8/19/04 | |
| Robin | | Thomas | 10201 Kempton Ave | Cleveland | 44108-2956 | 8/19/04 | |
| Marcus | | Wilson | 10539 Earle Ave | Cleveland | 44108-3019 | 8/20/04 | |
| Shaun | | Madison | 10562 Earle Ave 1 | Cleveland | 44108-3020 | 8/19/04 | |
| Dante | L | Richmond | 11707 Fairport Ave | Cleveland | 44108-3113 | 8/20/04 | |
| Roxie | D | Black | 12100 Ohlman Ave Apt 5 | Cleveland | 44108-3128 | 8/19/04 | |
| Rosella | | Dumas | 11401 Ohlman Ave | Cleveland | 44108-3131 | 8/20/04 | |
| Michael | W | Larry | 11617 Ohlman Ave | Cleveland | 44108-3135 | 8/19/04 | |
| Lenarcus | D | Roberson | 11618 Ohlman Ave | Cleveland | 44108-3136 | 8/19/04 | |
| Martha | A | Dixon | 11601 Tuscora Ave | Cleveland | 44108-3155 | 8/19/04 | |
| Antoine | C | Whitsett | 11606 Tuscora Ave | Cleveland | 44108-3156 | 8/19/04 | |
| Iaeron | D | Johnson | 11805 Tuscora Ave | Cleveland | 44108-3159 | 8/20/04 | |
| Ezin | | Lever | 10200 Adams Rd | Cleveland | 44108-3213 | 8/19/04 | |
| Julie | S | Johnson | 9304 Adams Ave | Cleveland | 44108-3221 | 8/20/04 | |
| Ann | M | Edwards | 9601 Adams Ave | Cleveland | 44108-3226 | 8/20/04 | |
| Shauna | | Curt | 9708 Adams Ave | Cleveland | 44108-3229 | 8/20/04 | |
| Timothy | E | Williams | 1249 E 89th St Apt 1 | Cleveland | 44108-3361 | 8/20/04 | |
| Ronnie | L | Hill | 10010 Ostend Ave | Cleveland | 44108-3404 | 8/20/04 | |
| Andre | | Green | 10002 Somerset Ave #12 | Cleveland | 44108-3416 | 8/20/04 | |
| Eric | | Camon | 10223 Somerset Ave DN | Cleveland | 44108-3419 | 8/20/04 | |
| Noah | | Bloch | 10409 Somerset Ave | Cleveland | 44108-3423 | 8/20/04 | |
| Sharaud | | Franks | 9822 North Blvd | Cleveland | 44108-3428 | 8/19/04 | |

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| Charisse | C | Charles | 10235 South Blvd #N-11 | Cleveland | 44108-3447 | 8/19/04 | |
| tim | L | Lindsay | 1273 E 100th St | Cleveland | 44108-3502 | 8/19/04 | |
| Jacqueline | D | Manley | 1245 E 102nd St DN | Cleveland | 44108-3506 | 8/19/04 | |
| Aaron | | Clark | 10729 Hathaway Ave | Cleveland | 44108-3515 | 8/19/04 | |
| Anwarun | | Jones | 10702 Olivet Ave | Cleveland | 44108-3526 | 8/19/04 | |
| Roy | J | Johnson | 1236 E 105th St | Cleveland | 44108-3568 | 8/19/04 | |
| Wilbro | B | Hamilton | 1265 Parkwood Dr | Cleveland | 44108-3616 | 8/19/04 | |
| Meggieen | R | Davis | 10921 Grantwood Ave | Cleveland | 44108-3626 | 8/19/04 | |
| Joanna | L | Berry | 10916 Grantwood Ave | Cleveland | 44108-3627 | 8/19/04 | |
| Brandon | C | Murray | 10936 Grantwood Ave | Cleveland | 44108-3627 | 8/19/04 | |
| Willie | A | Gardner | 10933 Hampden Ave | Cleveland | 44108-3636 | 8/19/04 | |
| Matissa | | King | 10800 Tacoma Ave | Cleveland | 44108-3644 | 8/19/04 | |
| Veneccia | T | Brusteter | 10905 Pasadena Ave | Cleveland | 44108-3665 | 8/19/04 | |
| Timothy | | Hill | 11123 ADA Ave | Cleveland | 44108-3716 | 8/19/04 | |
| Tia | | Shone | 11127 ADA Ave | Cleveland | 44108-3716 | 8/19/04 | |
| Eddie | J | Lewis | 11110 ADA Ave | Cleveland | 44108-3717 | 8/19/04 | |
| Ervin | | Hayes | 1107 E 111th St | Cleveland | 44108-3728 | 8/19/04 | |
| Daniel | J | Woods | 1113 E 111th St | Cleveland | 44108-3728 | 8/19/04 | |
| Brian | W | Vaughn | 1255 E 112th St | Cleveland | 44108-3735 | 8/19/04 | |
| Brian | | Vaughn | 1255 E 112th St | Cleveland | 44108-3735 | 8/19/04 | |
| Brian | | Vaughn | 1255 E 112th St #40 | Cleveland | 44108-3735 | 8/19/04 | |
| Aaron | J | Scriven | 1258 E 112th St | Cleveland | 44108-3736 | 8/19/04 | |
| Edward | L | Hood | 1250 E 114th St | Cleveland | 44108-3747 | 8/19/04 | |
| Jermaine | | Stone | 1025 Linn Dr Apt 5 | Cleveland | 44108-3767 | 8/19/04 | |
| Aaron | | Weems | 1084 E 123rd St | Cleveland | 44108-3864 | 8/19/04 | |
| India | J | George | 12337 Tuscora Ave | Cleveland | 44108-3865 | 8/19/04 | |
| Iose | | Jackson | 1046 Lakeview Rd | Cleveland | 44108-3900 | 8/19/04 | |
| Teralynn | | Norman | 1046 Lakeview Rd | Cleveland | 44108-3900 | 8/19/04 | |
| Andrew | W | Price | 1243 E 123rd St 6 | Cleveland | 44108-4001 | 8/20/04 | |
| Rogar | L | Simmons | 12009 Osceola Ave | Cleveland | 44108-4025 | 8/19/04 | |
| Robert | | Bates | 12106 Phillips Ave | Cleveland | 44108-4040 | 8/19/04 | |
| Tracey | L | Ohara | 1139 Lakeview Rd | Cleveland | 44108-4053 | 8/19/04 | |
| Tanisha | N | Davis | 1231 E 124th St Apt 2 | Cleveland | 44108-4081 | 8/19/04 | |
| Crystal | M | Wakefield | 660 E 99th St Apt 2 | Cleveland | 44108-4105 | 8/20/04 | |
| Mentiah | M | Thornton | 797 E 90th St | Cleveland | 44108-4127 | 8/20/04 | |
| Charles | D | Barnett | 613 E 120th St | Cleveland | 44108-4203 | 8/19/04 | |
| Maric | J | Benson | 625 E 117th St | Cleveland | 44108-4204 | 8/19/04 | |

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| Melissa | L | Carte | | 3152 W 41st St | Cleveland | 44109-1274 | 8/19/04 | |
| Melvin | | Martinez | | 1643 Holmden Ave | Cleveland | 44109-1724 | 8/19/04 | |
| Maeva | | Carr | | 3121 Woodridge Ave | Cleveland | 44109-2175 | 8/19/04 | |
| Clifton | C | Mosby | | 2711 Riverside Ave | Cleveland | 44109-2321 | 8/19/04 | |
| Ronald | | Cable | | 4406 Denison Ave | Cleveland | 44109-2609 | 8/19/04 | |
| Randall | A | Hannon | | 3512 Hennize Ave | Cleveland | 44109-3242 | 8/19/04 | |
| Gilbert | | Henderson | | 4239 W 24th St Rear | Cleveland | 44109-3301 | 8/19/04 | |
| Gilbert | R | Henderson | | 4239 W 24th St Rear | Cleveland | 44109-3301 | 8/19/04 | |
| Yvonne | | Scott | | 16700 Lake Shore Blvd | Cleveland | 44110-1071 | 8/19/04 | |
| Cathy | L | Dew | | 15448 Lake Shore Blvd | Cleveland | 44110-1121 | 8/19/04 | |
| Robert | | McQueen | | 16001 Euclid Beach Blvd Apt 123 | Cleveland | 44110-1127 | 8/19/04 | |
| Clark | S | Bryson | | 123 E 156th St | Cleveland | 44110-1181 | 8/19/04 | |
| Robert | | Lewis | | 125 E 156th St | Cleveland | 44110-1182 | 8/19/04 | |
| Daya | F | Wright | | 285 E 150th St | Cleveland | 44110-1210 | 8/19/04 | |
| Don | | Caldwell | | 15612 Groveswood Ave | Cleveland | 44110-1404 | 8/19/04 | |
| April | | Clark | | 1240 E 170th St | Cleveland | 44110-1541 | 8/19/04 | |
| Yvonne | | Clark | | 1240 E 170th St | Cleveland | 44110-1541 | 8/20/04 | |
| Eric | A | Payne | | 1256 E 170th St | Cleveland | 44110-1572 | 8/19/04 | |
| Rochelle | | Day | | 446 E 157th St | Cleveland | 44110-1648 | 8/19/04 | |
| Clarence | | Iadson | St | 13823 Lake Shore Blvd | Cleveland | 44110-1923 | 8/19/04 | |
| Jennaveve | | Madison | | 13906 Lake Shore Blvd | Cleveland | 44110-1931 | 8/19/04 | |
| Maurice | I | Davis | | 13304 Englestone Ave | Cleveland | 44110-2138 | 8/19/04 | |
| Harold | J | Hameter | | 13585 Fairwood Rd | Cleveland | 44110-2222 | 8/19/04 | |
| Cynthia | A | Rider-Sugg | | 775 E 152nd St | Cleveland | 44110-2304 | 8/19/04 | |
| Mark | K | Sheline | | 775 E 152nd St S-10 | Cleveland | 44110-2304 | 8/19/04 | |
| Ernest | | Smith | | 17041 Saint Clair Ave | Cleveland | 44110-2528 | 8/19/04 | |
| Arbina | | Fitzgerald | | 19230 Nottingham Rd | Cleveland | 44110-2724 | 8/19/04 | |
| Charisse | L | Berry | | 16024 Saint Clair Ave | Cleveland | 44110-3027 | 8/19/04 | |
| Lamar | | Williams | | 786 London Rd 2 | Cleveland | 44110-3112 | 8/19/04 | |
| Michael | | Wilmore | | 1014 Ivanhoe Rd #2 | Cleveland | 44110-3207 | 8/19/04 | |
| Michael | | Wilmore | | 1014 Ivanhoe Rd #2 | Cleveland | 44110-3207 | 8/19/04 | |
| Roxanne | Y | Tewksbury | | 15630 Halliday Ave | Cleveland | 44110-3239 | 8/19/04 | |
| Dannian | | Taylor | | 13623 Glenside Rd | Cleveland | 44110-3523 | 8/19/04 | |
| Alvin | L | Martin | | 13654 Saint Clair Ave | Cleveland | 44110-3547 | 8/19/04 | |
| Albert | M | Brown | | 904 E 146th St | Cleveland | 44110-3704 | 8/19/04 | |
| Alonzo | | Ford | | 827 E 147th St | Cleveland | 44110-3721 | 8/19/04 | |
| Anthony | | Harris | | 1637 Ansel Rd | Cleveland | 44110-4104 | 8/19/04 | |

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| Melvin | I | Smith | 10418 Almita Ave | Cleveland | 44111-1209 | 8/19/04 | |
| Ricky | | Wilkinson | 10212 Loreta Ave | Cleveland | 44111-1260 | 8/19/04 | |
| Gabriel | O | Linton | 14424 Birchwood Ave | Cleveland | 44111-1312 | 8/19/04 | |
| Michelle | L | Vaught | 3317 W 119th St | Cleveland | 44111-1760 | 8/19/04 | |
| Nashon | S | Hamilton | 3081 W 105th St | Cleveland | 44111-1843 | 8/19/04 | |
| Ruben | J | Rodriguez | 3419 W 135th St | Cleveland | 44111-2405 | 8/19/04 | |
| Lanise | M | Penn | 3284 W 129th St | Cleveland | 44111-2501 | 8/19/04 | |
| Lara | D | Wells | 12123 Trickett Rd UP | Cleveland | 44111-2549 | 8/19/04 | |
| Beatrice | R | Bennett | 10229 Bernard Ave | Cleveland | 44111-2802 | 8/19/04 | |
| Derek | | Smith | 10909 Joan Ave | Cleveland | 44111-2813 | 8/19/04 | |
| Kurt | P | Neubauer | 3275 W 110th St | Cleveland | 44111-2825 | 8/19/04 | |
| Art | | Knight | 3865 W 118th St | Cleveland | 44111-3007 | 8/19/04 | |
| Robert | | Allen | 3625 W 147th St Apt 307 | Cleveland | 44111-3182 | 8/19/04 | |
| Kathryn | | Callens | 3459 W 117th St | Cleveland | 44111-3520 | 8/19/04 | |
| Maria | | Hernandez | 3484 W 120th St | Cleveland | 44111-3536 | 8/19/04 | |
| David | A | Smith | 12027 Lorain Ave | Cleveland | 44111-3568 | 8/19/04 | |
| Sylvester | | Harris | 11316 Hendley Ave UP | Cleveland | 44111-3630 | 8/19/04 | |
| Rhonda | | Ferguson | 3487 W 100th St | Cleveland | 44111-3841 | 8/19/04 | |
| Chris | | Keffe | 3515 W 105th St | Cleveland | 44111-3858 | 8/19/04 | |
| Noah | K | Monroe | 3500 W 125th St | Cleveland | 44111-3859 | 8/19/04 | |
| Jacob | L | Evand | 3673 West Blvd | Cleveland | 44111-3859 | 8/19/04 | |
| Carmen | | Savarino | 3579 W 105th St | Cleveland | 44111-3879 | 8/19/04 | |
| Sammuel | | Santiago | 12205 Brighton Ave | Cleveland | 44111-4529 | 8/19/04 | |
| Sonia | M | Gonzalez | 11839 Brighton Ave | Cleveland | 44111-4639 | 8/19/04 | |
| James | P | Muniak | 11301 Saint Mark Ave | Cleveland | 44111-4761 | 8/19/04 | |
| George | J | Rich | 3865 W 116th St | Cleveland | 44111-5214 | 8/19/04 | |
| Deangelo | E | Thomas | 16321 Lorain Ave Apt 409 | Cleveland | 44111-5548 | 8/19/04 | |
| Muhammad | | Haftz | 3634 Bosworth Rd | Cleveland | 44111-6000 | 8/19/04 | |
| Henry | R | Johnson | 3640 Bosworth Rd 24 | Cleveland | 44111-6004 | 8/19/04 | |
| Julio | E | Cordero | 3664 Bosworth Rd | Cleveland | 44111-6011 | 8/19/04 | |
| Phillip | A | Batie | 3670 Bosworth Rd | Cleveland | 44111-6013 | 8/19/04 | |
| Ashlee | C | Eaton | 18140 Euclid Ave | Cleveland | 44112-1089 | 8/19/04 | |
| Katy | M | Wilcox | 1855 Cliffview Rd | Cleveland | 44112-1114 | 8/19/04 | |
| Joshua | W | Huddleston | 1881 Noble Rd Apt 1 | East Cleveland | 44112-1664 | 8/19/04 | |
| Victoria | T | Lewis | 15600 Terrace Rd Apt 311 | East Cleveland | 44112-2047 | 8/19/04 | |
| Noelia | | Velasquez | 15600 Terrace Rd Apt 702 | East Cleveland | 44112-2049 | 8/19/04 | |
| Dunc | G | Shepherd | 15632 Euclid Ave | East Cleveland | 44112-2065 | 8/19/04 | |

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|-------------|-------------|--------|-------------------------------|----------------|------------|---------|--|
| Bernard | | Wilson | 15632 Euclid Ave | East Cleveland | 44112-2065 | 8/19/04 | |
| Denita | Johnson | | 1710 Lakewood Ave | East Cleveland | 44112-2123 | 8/19/04 | |
| Calvin | Richardson | | 1710 Lakewood Ave | East Cleveland | 44112-2133 | 8/19/04 | |
| Vincent | A Heishell | | 15999 Nelmore Rd | East Cleveland | 44112-2209 | 8/19/04 | |
| Talisha | C Hall | | 1284 E 133rd St UP | East Cleveland | 44112-2402 | 8/19/04 | |
| Janet | P Roberts | | 1370 E 134th St | East Cleveland | 44112-2453 | 8/19/04 | |
| Rico | Sanchez | | 1352 E 143rd St | East Cleveland | 44112-2540 | 8/19/04 | |
| Mark | M Taylor | | 1315 Coit Ave | East Cleveland | 44112-2653 | 8/19/04 | |
| Sharon | Miner | | 1335 Elwood Rd | East Cleveland | 44112-2701 | 8/19/04 | |
| John | L Biller | | 1770 Shaw Ave | East Cleveland | 44112-2813 | 8/19/04 | |
| Adolfo | X Ilanot | | 1849 Taylor Rd | East Cleveland | 44112-2846 | 8/19/04 | |
| Phea | C Mason | | 1724 Taylor Rd | East Cleveland | 44112-2888 | 8/19/04 | |
| Tennie | A Jackson | | 1565 W 29th St 4 | Cleveland | 44112-2906 | 8/19/04 | |
| Mary | Johnson | | 13507 5th Ave | East Cleveland | 44112-3105 | 8/19/04 | |
| Daniel | Whitfield | | 14600 Euclid Ave | East Cleveland | 44112-3451 | 8/19/04 | |
| Keith | Fleming | | 1885 Windemere St | East Cleveland | 44112-3903 | 8/19/04 | |
| Jason | Dixon | | 1889 Windemere St | East Cleveland | 44112-3903 | 8/19/04 | |
| Janille | West | | 1810 Beersford Rd Apt 2 | East Cleveland | 44112-3994 | 8/19/04 | |
| Kathleen | A Duran | | 12808 Phillips Ave | East Cleveland | 44112-4112 | 8/19/04 | |
| Tashara | M Barkley | | 1204 Melbourne Rd | East Cleveland | 44112-4137 | 8/19/04 | |
| Charles | C Collins | | 1988 Hayden Ave | East Cleveland | 44112-4139 | 8/20/04 | |
| Larry | Harris | | 1175 Rozelle Ave | East Cleveland | 44112-4141 | 8/19/04 | |
| Lakesha | R Thomas | | 1188 Rozelle Ave | East Cleveland | 44112-4142 | 8/19/04 | |
| Joseph | Smith | | 1191 E 125th St | East Cleveland | 44112-4165 | 8/19/04 | |
| Alvin | Head | | 1724 Hartshorn Rd Apt 3 | East Cleveland | 44112-4262 | 8/19/04 | |
| Angels | C Clark | | 1716 Hartshorn Rd Apt 1 | East Cleveland | 44112-4264 | 8/19/04 | |
| Ronald | L Reynolds | | 1875 Forest Hills Blvd Apt C6 | East Cleveland | 44112-4351 | 8/19/04 | |
| David | L Stanely | | 13800 Terrace Rd | East Cleveland | 44112-4357 | 8/19/04 | |
| Tony | Thomas | | 1755 Cardyon Rd | East Cleveland | 44112-4403 | 8/19/04 | |
| Keith | Black | | 1726 E 133rd St Apt 203 | East Cleveland | 44112-4846 | 8/19/04 | |
| David | P Kister | | 1278 W 9th St | Cleveland | 44113-1028 | 8/19/04 | |
| Christopher | C Clinton | | 1300 W 9th St | Cleveland | 44113-1031 | 8/19/04 | |
| Cedric | D Beckett | | 1300 W 9th St | Cleveland | 44113-1031 | 8/19/04 | |
| Lindsay | B Lombardy | | 1300 W 9th St | Cleveland | 44113-1031 | 8/19/04 | |
| Lonnice | Issac | | 1300 W 9th St | Cleveland | 44113-1031 | 8/19/04 | |
| Erk | S Iodemeier | | 1300 W 9th St | Cleveland | 44113-1031 | 8/19/04 | |
| David | W Dulabon | | 1300 W 9th St | Cleveland | 44113-1031 | 8/19/04 | |

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| City | | Bishop | | 1299 W 25th St 301 | Cleveland | 44113-1101 | 8/19/04 | |
| Robert | A | Wilson | If | 2600 Loop Dr | Cleveland | 44113-1122 | 8/19/04 | |
| Thune | | Bell | | 1280 Spruce Ct | Cleveland | 44113-1136 | 8/19/04 | |
| Harry | | Wellis | | 1295 Spruce Ct | Cleveland | 44113-1143 | 8/19/04 | |
| Leon | | Kelly | | 2550 Loop Dr | Cleveland | 44113-1197 | 8/19/04 | |
| Newton | I | Jackson | | 976 W Saint Clair Ave | Cleveland | 44113-1211 | 8/19/04 | |
| Oris | | Grinberg | | 955 W Saint Clair Ave | Cleveland | 44113-1233 | 8/19/04 | |
| Frank | I | Valasiades | | 955 W Saint Clair Ave | Cleveland | 44113-1233 | 8/19/04 | |
| Christopher | L | Green | | 955 W Saint Clair Ave | Cleveland | 44113-1247 | 8/19/04 | |
| Alfred | A | Moore | | 710 W Saint Clair Ave | Cleveland | 44113-1804 | 8/19/04 | |
| Nasser | | Moiduddin | | 740 W Superior Ave | Cleveland | 44113-2320 | 8/19/04 | |
| Robert | D | Hoff | | 2249 Elm Ave | Cleveland | 44113-2320 | 8/19/04 | |
| Danail | | Hriston | | 2249 Elm Ave | Cleveland | 44113-2320 | 8/19/04 | |
| Ronald | W | Davidson | | 1854 Scranton Rd | Cleveland | 44113-2434 | 8/19/04 | |
| Samuil | K | Shah | | 1500 Detroit Ave | Cleveland | 44113-2444 | 8/19/04 | |
| Samantha | L | Farlow | | 1500 Detroit Ave | Cleveland | 44113-2444 | 8/19/04 | |
| Rebecca | | Feist | | 1500 Detroit Ave | Cleveland | 44113-2444 | 8/19/04 | |
| Lisa | I | Molinaro | | 1500 Detroit Ave | Cleveland | 44113-2603 | 8/19/04 | |
| Donte | | Thomas | | 2648 Division Ave | Cleveland | 44113-2608 | 8/19/04 | |
| Kamille | T | Young | | 2738 Division Ave | Cleveland | 44113-2615 | 8/19/04 | |
| Sharunda | M | Stimesl | | 2621 Division Ave | Cleveland | 44113-2619 | 8/19/04 | |
| Heather | E | Anderson | | 2705 Division Ave Apt 570 | Cleveland | 44113-2640 | 8/19/04 | |
| Daniel | S | Walker | | 2700 Washington Ave | Cleveland | 44113-2640 | 8/19/04 | |
| Michael | I | Key | | 2700 Washington Ave | Cleveland | 44113-2659 | 8/19/04 | |
| Gregory | R | Gray | | 2616 Division Ave Apt 462 | Cleveland | 44113-2667 | 8/19/04 | |
| Adam | I | Mitchell | | 2558 Division Ave | Cleveland | 44113-2711 | 8/19/04 | |
| Vincent | C | Marconi | | 2860 Detroit Ave | Cleveland | 44113-2733 | 8/19/04 | |
| Jeff | L | Palmer | | 2849 Detroit Ave | Cleveland | 44113-3033 | 8/19/04 | |
| Jeffrey | | Barnes | | 2515 Jay Ave | Cleveland | 44113-3104 | 8/19/04 | |
| Jennifer | | Marrano | | 1512 W 25th St | Cleveland | 44113-3109 | 8/19/04 | |
| William | L | Sayle | | 1745 W 25th St | Cleveland | 44113-3109 | 8/19/04 | |
| Deborah | A | Leonard | | 1745 W 25th St | Cleveland | 44113-3109 | 8/19/04 | |
| Chuckie | S | Whezel | | 1745 W 25th St | Cleveland | 44113-3109 | 8/19/04 | |
| Rubin | J | Szerlip | | 1745 W 25th St | Cleveland | 44113-3109 | 8/19/04 | |
| Raymond | | Alexander | | 1745 W 25th St | Cleveland | 44113-3109 | 8/19/04 | |
| Jewel | T | Henderson | | 1745 W 25th St | Cleveland | 44113-3109 | 8/19/04 | |
| Carolyn | E | Peoples | | 1745 W 25th St | Cleveland | 44113-3109 | 8/19/04 | |

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| Jacqueline | | Diaz | 1745 W 25th St | Cleveland | 44113-3109 | 8/19/04 | |
| Willie | E | Williams | 1745 W 25th St | Cleveland | 44113-3109 | 8/19/04 | |
| Carlton | L | James | 1745 W 25th St | Cleveland | 44113-3109 | 8/19/04 | |
| Anna | M | Young | 1745 W 25th St 9015 | Cleveland | 44113-3109 | 8/19/04 | |
| Ivan | R | Rivera | 1795 W 25th St | Cleveland | 44113-3112 | 8/19/04 | |
| George | | Johnson | 1795 W 25th St | Cleveland | 44113-3112 | 8/19/04 | |
| Tony | A | Bussey | 1795 W 25th St | Cleveland | 44113-3112 | 8/19/04 | |
| Kelvin | N | Young | 1795 W 25th St | Cleveland | 44113-3112 | 8/19/04 | |
| Tito | | Cruz | 1795 W 25th St | Cleveland | 44113-3112 | 8/19/04 | |
| Malik | | Wallyudin | 1795 W 25th St | Cleveland | 44113-3112 | 8/19/04 | |
| John | | Watham | 1795 W 25th St 1004 | Cleveland | 44113-3112 | 8/19/04 | |
| Mary | | Miles | 1795 W 25th St 1009 | Cleveland | 44113-3112 | 8/19/04 | |
| Gregory | | Reeves | 1795 W 25th St 1015 | Cleveland | 44113-3236 | 8/19/04 | |
| Angelita | | Woodard | 4115 Whitman Ave UP | Cleveland | 44113-3316 | 8/19/04 | |
| Timothy | E | Opus | 3926 Bridge Ave | Cleveland | 44113-3418 | 8/19/04 | |
| Kathryn | L | Francis | 1951 W 25th St | Cleveland | 44113-3548 | 8/19/04 | |
| Alenia | A | Collins | 2051 W 19th St UP | Cleveland | 44113-3554 | 8/19/04 | |
| Robert | E | Bierce | 2000 Scranton Rd 5013 | Cleveland | 44113-3654 | 8/19/04 | |
| Kouita | S | Borders | 2098 W 11th St | Cleveland | 44113-3658 | 8/19/04 | |
| Michael | L | Clark | 2085 W 10th St | Cleveland | 44113-3659 | 8/19/04 | |
| Miriam | | Torres | 2142 W 10th St | Cleveland | 44113-3701 | 8/19/04 | |
| Level | | Rogers | 3225 Lorain Ave | Cleveland | 44113-3702 | 8/19/04 | |
| Ron | H | Fredrick | 3200 Lorain Ave | Cleveland | 44113-3704 | 8/19/04 | |
| Mark | | Stevenson | 3536 Lorain Ave | Cleveland | 44113-3845 | 8/19/04 | |
| Marvin | L | Raum | 2160 W 40th Pl 2 | Cleveland | 44113-3905 | 8/19/04 | |
| Frances | | Torres | 2237 W 33rd St | Cleveland | 44113-3907 | 8/19/04 | |
| Duice | M | Barrientos | 2117 W 33rd Pl | Cleveland | 44113-3950 | 8/19/04 | |
| Ida | | Wilhelmnia | 3200 Monroe Ave | Cleveland | 44113-4015 | 8/19/04 | |
| Marta | | Lopez | 2117 W 31st St | Cleveland | 44113-4049 | 8/19/04 | |
| Desmond | | Green | 2207 W 30th St | Cleveland | 44113-4274 | 8/19/04 | |
| Cortie | A | Minor | 2128 W 19th St Apt 3 | Cleveland | 44113-4401 | 8/19/04 | |
| Kiesha | M | Tripp | 2461 W 11th St | Cleveland | 44113-4417 | 8/19/04 | |
| Jose | | Russel | 1210 Kenilworth Ave | Cleveland | 44113-4508 | 8/19/04 | |
| Mary | | Smith | 2504 W 7th St 12 | Cleveland | 44113-4508 | 8/19/04 | |
| Karen | | Pierre | 2516 W 7th St | Cleveland | 44113-4528 | 8/19/04 | |
| Tianna | S | Watts | 2531 W 6th Pl #D | Cleveland | 44113-4563 | 8/19/04 | |
| Michael | C | Harrison | 2585 W 5th St Apt C | Cleveland | 44113-4563 | 8/19/04 | |

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| minie | E | Glover | | 2567 W 5th St | Cleveland | 44113-4565 | 8/19/04 | |
| obert | L | Abernathy | | 2559 W 5th St | Cleveland | 44113-4566 | 8/20/04 | |
| omas | C | Hopper | | 2559 W 5th St 2 | Cleveland | 44113-4566 | 8/19/04 | |
| osolyn | R | Carter | | 2551 W 5th St Apt H | Cleveland | 44113-4567 | 8/19/04 | |
| oy | W | Reese | | 2541 W 5th St | Cleveland | 44113-4568 | 8/19/04 | |
| enya | L | Myers | | 2529 W 5th St Apt J | Cleveland | 44113-4570 | 8/19/04 | |
| alecka | D | Middlebrooks | | 2521 W 5th St | Cleveland | 44113-4571 | 8/19/04 | |
| on | | Sims | | 2503 W 5th St Apt A | Cleveland | 44113-4573 | 8/19/04 | |
| Charles | D | Vanhorn | Jr | 2503 W 5th St Apt F | Cleveland | 44113-4573 | 8/19/04 | |
| ndre | | Thompson | | 2521 W 6th St | Cleveland | 44113-4575 | 8/19/04 | |
| Mustafa | Z | Jefferson | | 2565 W 7th St Apt D | Cleveland | 44113-4584 | 8/19/04 | |
| Chris | | Jones | | 2525 W 7th St | Cleveland | 44113-4587 | 8/19/04 | |
| John | | Walsh | | 2792 W 32nd St | Cleveland | 44113-4706 | 8/19/04 | |
| Kimberly | | Wade | | 2558 W 25th St #501 | Cleveland | 44113-4707 | 8/19/04 | |
| Al | D | James | | 2576 W 25th St 4 | Cleveland | 44113-4707 | 8/19/04 | |
| Donell | | Edmond | | 2609 W 25th St | Cleveland | 44113-4708 | 8/19/04 | |
| Magally | | Rodriguez | | 3014 Barber Ave | Cleveland | 44113-4731 | 8/19/04 | |
| Jimmy | | Oa | | 2730 W 30th St | Cleveland | 44113-4753 | 8/19/04 | |
| Latorya | L | Wilson | | 2998 W 38th St | Cleveland | 44113-4804 | 8/19/04 | |
| Dionne | L | Forpahl | | 3426 Seymour Ave | Cleveland | 44113-4924 | 8/19/04 | |
| John | D | Sartler | | 3444 Walton Ave | Cleveland | 44113-4929 | 8/19/04 | |
| Sarina | | Williams | | 3038 Walton Ave | Cleveland | 44113-5040 | 8/19/04 | |
| Chartra | | Marrels | | 3104 Walton Ave | Cleveland | 44113-5040 | 8/19/04 | |
| Jose | | Rodeza | | 1458 W 25th St 4 | Cleveland | 44113-5102 | 8/19/04 | |
| Edik | N | Gonzalez | | 3040 W 14th St | Cleveland | 44113-5255 | 8/19/04 | |
| Jennifer | A | Knickle | | 1211 W 9th St | Cleveland | 44113-5500 | 8/19/04 | |
| Eddie | I | Shelton | | 2102 Lakeside Ave | Cleveland | 44114-1126 | 8/19/04 | |
| Walter | | Perry | | 522 Superior Ave 302 | Cleveland | 44114-1215 | 8/19/04 | |
| Major | L | Riggins | Jr | 1380 E 13th St | Cleveland | 44114-1807 | 8/20/04 | |
| Reba | L | Cloud | | 1040 Saint Clair Ave NE | Cleveland | 44114-1825 | 8/19/04 | |
| Markisha | B | Johnson | | 1543 Saint Clair Ave NE | Cleveland | 44114-2003 | 8/19/04 | |
| Fredddie | | Stackhouse | | 1838 Superior Ave | Cleveland | 44114-2108 | 8/19/04 | |
| Pamela | M | Shorter | | 1850 Superior Ave | Cleveland | 44114-2130 | 8/19/04 | |
| Barbara | C | Johnson | | 1873 Superior Ave | Cleveland | 44114-2134 | 8/19/04 | |
| John | | Rivers | | 1512 E 19th St Apt 25B | Cleveland | 44114-2135 | 8/19/04 | |
| Dyon | J | Law | | 151 E 19th St | Cleveland | 44114-2138 | 8/19/04 | |
| Janice | D | Daniels | | 1512 E 19th St #24-B | Cleveland | 44114-2138 | 8/19/04 | |

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|-----------|---|----------|-------------------------|-----------|------------|---------|--|
| Thibony | L | Rice | 275 Euclid Ave #14 | Cleveland | 44114-2205 | 8/19/04 | |
| Damone | K | Thompson | 1012 Superior Ave | Cleveland | 44114-2515 | 8/19/04 | |
| Stacy | M | Hopskin | 1484 Superior Ave | Cleveland | 44114-2904 | 8/19/04 | |
| Kimbrogh | D | Lavoris | 1525 Superior Ave | Cleveland | 44114-2905 | 8/19/04 | |
| Danny | | Johnson | 1512 Superior Ave 3B | Cleveland | 44114-2906 | 8/19/04 | |
| Vaughn | R | McCline | 1736 Payne Ave | Cleveland | 44114-2910 | 8/19/04 | |
| Gregory | H | Neilson | 1701 E 12th St | Cleveland | 44114-3236 | 8/19/04 | |
| Brendan | P | Sweeney | 1701 E 12th St | Cleveland | 44114-3236 | 8/19/04 | |
| Dennis | W | Jarecke | 1701 E 12th St | Cleveland | 44114-3236 | 8/19/04 | |
| Marco | S | Marrello | 1701 E 12th St | Cleveland | 44114-3236 | 8/19/04 | |
| Jessie | M | Foltz | 1701 E 12th St 206W | Cleveland | 44114-3236 | 8/19/04 | |
| Ramon | I | Milano | 1801 E 12th St | Cleveland | 44114-3500 | 8/19/04 | |
| Eric | D | Rose | 3439 Superior Ave | Cleveland | 44114-4124 | 8/19/04 | |
| Michael | I | Moss | 3439 Superior Ave 306-E | Cleveland | 44114-4124 | 8/19/04 | |
| Willie | M | Williams | 2900 Superior Ave | Cleveland | 44114-4202 | 8/19/04 | |
| Michale | L | Rogers | 3642 Payne Ave | Cleveland | 44114-4316 | 8/19/04 | |
| David | T | Crumbsy | 1260 Prospect Ave 501 | Cleveland | 44115-1210 | 8/19/04 | |
| Bennie | C | Anthony | 1017 Prospect Ave 803 | Cleveland | 44115-1226 | 8/19/04 | |
| Joseph | M | Rudedge | 1127 Euclid Ave | Cleveland | 44115-1601 | 8/19/04 | |
| Warren | F | Clayton | 1127 Euclid Ave | Cleveland | 44115-1601 | 8/19/04 | |
| Robert | T | Hill | 1127 Euclid Ave | Cleveland | 44115-1601 | 8/19/04 | |
| Kishaun | R | Cotchey | 1540 Euclid Ave 428 | Cleveland | 44115-2103 | 8/19/04 | |
| Robert | F | David | 1793 Euclid Ave | Cleveland | 44115-2105 | 8/19/04 | |
| William | H | Seng | 2130 Euclid Ave | Cleveland | 44115-2215 | 8/19/04 | |
| Karel | A | Smith | 2130 Euclid Ave | Cleveland | 44115-2215 | 8/19/04 | |
| Alyssa | M | Bender | 2130 Euclid Ave | Cleveland | 44115-2215 | 8/19/04 | |
| Lawana | M | Anderson | 2130 Euclid Ave | Cleveland | 44115-2215 | 8/19/04 | |
| Christy | A | Lewis | 2130 Euclid Ave | Cleveland | 44115-2215 | 8/19/04 | |
| John | R | Seng | 2130 Euclid Ave #91 | Cleveland | 44115-2215 | 8/19/04 | |
| Michelle | S | Fowler | 2741 Euclid Ave 12 | Cleveland | 44115-2411 | 8/19/04 | |
| Dominique | L | Jones | 2757 Euclid Ave 7 | Cleveland | 44115-2411 | 8/19/04 | |
| David | I | Williams | 2961 Euclid Ave | Cleveland | 44115-2415 | 8/19/04 | |
| Karina | D | Cooper | 3259 Euclid Ave | Cleveland | 44115-2509 | 8/19/04 | |
| Nona | M | Smith | 1066 Carnegie Ave | Cleveland | 44115-2804 | 8/19/04 | |
| Kimberly | A | Wilson | 2219 E 22nd St | Cleveland | 44115-2914 | 8/19/04 | |
| Willie | S | Jackson | 2606 Cedar Ave 2 | Cleveland | 44115-2943 | 8/19/04 | |
| Freddie | | Johnson | 2198 E 37th St | Cleveland | 44115-3009 | 8/19/04 | |

mis-typed address

no record found
doesn't look like identification
looks like parking lot
meeting/celebration area
no records, not likely

SNB K551
CUTIES

mixed use building
single family/apts
side, tan, white
looks like residential
commercial area w/ parking
no record of address
no record, looks like park area
Statter Arms Apts
↓
can't find record
can't find record
Cleveland St. University
Some re
pay

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| | | | | | | | |
|-----------|---|-----------|-------------------------------|-------------------|------------|---------|--|
| Terrica | A | Hunter | 2336 E 30th St | Cleveland | 44115-3051 | 8/19/04 | |
| Sylvester | M | Jordan | 2256 Community College Ave | Cleveland | 44115-3116 | 8/19/04 | |
| Mitchell | J | Grant | 2436 E 36th St | Cleveland | 44115-3714 | 8/19/04 | |
| David | | Davis | 19217 Euclid Ave 204 | Euclid | 44117-1323 | 8/19/04 | |
| Dwain | K | McGhee | 19201 Euclid Ave Apt 102 | Euclid | 44117-1360 | 8/19/04 | |
| Baby | | Evans | 1500 E 191st St 508A | Euclid | 44117-1398 | 8/19/04 | |
| Aia | J | Holt | 20769 Euclid Ave C 406 | Euclid | 44117-1522 | 8/19/04 | |
| Cystal | B | Sutton | 22140 Euclid Ave Apt 410 | Euclid | 44117-1614 | 8/19/04 | |
| Kim | K | Leonadd | 22133 Euclid Ave | Euclid | 44117-1650 | 8/19/04 | |
| Steven | | Walter | 22141 Euclid Ave #223 | Euclid | 44117-1650 | 8/19/04 | |
| Larry | L | Howard | 22143 Euclid Ave | Euclid | 44117-1650 | 8/19/04 | |
| Brittany | N | Gordon | 22191 Euclid Ave 211 | Euclid | 44117-1650 | 8/19/04 | |
| Jim | I | Kenneth | 22114 Euclid Ave | Euclid | 44117-1651 | 8/19/04 | |
| Mika | E | Hayes | 24034 Euclid Ave | Euclid | 44117-1726 | 8/19/04 | |
| Larry | I | Smith | 25450 Glenbrook Blvd | Euclid | 44117-1820 | 8/19/04 | |
| Richard | | Harris | 25454 Euclid Ave 7 | Euclid | 44117-2642 | 8/19/04 | |
| Demon | M | Johnson | 1542 Coventry Rd | East Cleveland | 44118-1013 | 8/19/04 | |
| Michael | | Freeman | 14029 Superior | East Cleveland | 44118-1029 | 8/19/04 | |
| Tiffany | | Walker | 14015 Superior Rd | East Cleveland | 44118-1082 | 8/19/04 | |
| Jonnie | | Tate | 14015 Superior Rd | East Cleveland | 44118-1082 | 8/19/04 | |
| Elbony | L | Edwards | 14015 Superior Rd | East Cleveland | 44118-1082 | 8/19/04 | |
| Robert | G | Knitsch | 1646 Belmar Rd | Cleveland Heights | 44118-1156 | 8/19/04 | |
| Cory | S | Johnson | 1349 Forest Hills Blvd 4 | Cleveland | 44118-1367 | 8/19/04 | |
| Chimere | | Turner | 1867 S Taylor Rd | Cleveland Heights | 44118-2161 | 8/19/04 | |
| Seth | L | Jones | 3069 E Derbyshire Rd | Cleveland Heights | 44118-2726 | 8/19/04 | |
| Ramon | L | Finnell | 3118 Kensington Rd | Cleveland Heights | 44118-3542 | 8/19/04 | |
| Ray | | Harris | 3158 Kensington Rd | Cleveland Heights | 44118-3542 | 8/19/04 | |
| William | C | Kumfoia | 2582 Queenston Rd | Cleveland Heights | 44118-4352 | 8/19/04 | |
| Roberta | A | Schneider | 332 E 200th St | Euclid | 44119-1104 | 8/19/04 | |
| Stephanie | M | Muzia | 17825 Lake Shore Blvd Apt 102 | Cleveland | 44119-1226 | 8/20/04 | |
| Tisha | | Scott | 18207 Lanken Ave | Cleveland | 44119-3213 | 8/19/04 | |
| Delores | | Scott | 18207 Lanken Ave | Cleveland | 44119-3213 | 8/19/04 | |
| Rodney | | Scott | 18207 Lanken Ave | Cleveland | 44119-3213 | 8/19/04 | |
| Khalidiah | | Bryan | 16955 Shaker Blvd #120 | Lakewood | 44120-1631 | 8/20/04 | |
| Gregory | L | Glover | 2819 E 116th St | Cleveland | 44120-2146 | 8/19/04 | |
| Charles | | Schommel | 2856 S Moreland Blvd | Cleveland | 44120-2317 | 8/20/04 | |
| Laura | J | Jacobs | 2856 S Moreland Blvd #28 | Cleveland | 44120-2317 | 8/20/04 | |

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|------------|---|-----------|----|-----------------------------|----------------------|------------|---------|--|
| Denice | L | Pratt | | 2858 S Moreland Blvd | Cleveland | 44120-2317 | 8/20/04 | |
| Joe | | Bend | | 2920 E 118th St | Cleveland | 44120-2604 | 8/19/04 | |
| Leah | | Love | | 11828 Honeydale Ave 8 | Cleveland | 44120-2636 | 8/18/04 | |
| Christel | N | Johnson | | 2931 E 128th St | Cleveland | 44120-2667 | 8/20/04 | |
| William | E | Bacon | 1r | 12800 Signet Ave | Cleveland | 44120-3173 | 8/19/04 | |
| Richard | | Johnson | | 3578 E 139th St | Cleveland | 44120*4571 | 8/19/04 | |
| Alfonzo | D | Russell | | 3541 E 146th St | Cleveland | 44120-4828 | 8/20/04 | |
| Rebecca | M | Mynatt | | 3646 Menlo Rd | Shaker Heights | 44120-5057 | 8/19/04 | |
| Kriste | | Nowuck | | 7825 Joyce Dr | Parma | 44120-7150 | 8/20/04 | |
| Krista | | Nowuck | | 7835 Joyce Dr | Parma | 44120-7150 | 8/20/04 | |
| Eric | | Jones | | 2011 Green Rd UP | Cleveland | 44121-1109 | 8/20/04 | |
| James | M | Daniels | | 2057 Green Rd | Cleveland | 44121-1109 | 8/19/04 | |
| Jasmine | A | Hardy | | 2360 Greenvale Rd | Cleveland | 44121-1115 | 8/19/04 | |
| Lea | A | Johnson | | 2008 Cliffview Rd | Cleveland | 44121-1262 | 8/19/04 | |
| Charles | | Williams | | 1325 Yellowstone Rd | Cleveland Heights | 44121-1510 | 8/19/04 | |
| William | | Clark | | 3519 Radcliff Rd | Cleveland Heights | 44121-1547 | 8/19/04 | |
| John | J | Johnson | 1r | 1633 Wood Rd | Cleveland | 44121-1743 | 8/20/04 | |
| Eddy | J | Jackson | | 3739 Mayfield Rd Apt 202 | Cleveland | 44121-1751 | 8/20/04 | |
| Jayne | A | Prak | | 1480 Crest Rd Apt 3 | Cleveland | 44121-1769 | 8/20/04 | |
| Michael | P | Watts | | 1120 Cleveland Heights Blvd | Cleveland Heights | 44121-1822 | 8/19/04 | |
| Thomas | | Miller | | 863 Beverly Rd | Cleveland Heights | 44121-2003 | 8/19/04 | |
| Cheire | N | Allen | | 887 Englewood Rd | Cleveland Heights | 44121-2041 | 8/19/04 | |
| Regina | | Stewart | | 2486 Noble Rd #7-21 | Cleveland Heights | 44121-2132 | 8/19/04 | |
| Wagoria | | Thompson | | 1310 Avondale Rd | South Euclid | 44121-2528 | 8/20/04 | |
| Matthew | T | Berkowitz | | 1113 Argonne Rd | South Euclid | 44121-2914 | 8/20/04 | |
| Lamarkus | D | Brown | | 1015 Piedmont Rd | South Euclid | 44121-2934 | 8/19/04 | |
| Anita | | Brasmon | | 2246 S Green Rd | Cleveland | 44121-3324 | 8/20/04 | |
| Walter | D | Spencer | | 4746 Burger Rd | South Euclid | 44121-3831 | 8/19/04 | |
| Aron | K | Greenberg | | 23302 E Baintree Rd | Beechwood | 44122-1246 | 8/19/04 | |
| Harry | D | Schnur | | 46 Lyman Cir | Shaker Heights | 44122-2119 | 8/19/04 | |
| Raymond | G | Daley | | 19115 Shaker Blvd | Shaker Heights | 44122-2545 | 8/19/04 | |
| Tawonne | L | Hendking | | 27600 Chapin Blvd Ste 176 | Woodmere | 44122-4421 | 8/19/04 | |
| Keny | | Walker | | 19224 Scottsdale Blvd | Shaker Heights | 44122-6418 | 8/19/04 | |
| Acquanetta | D | Wells | | 3885 E 188th St | Cleveland | 44122-6562 | 8/19/04 | |
| Robert | | Herman | | 19411 Harvard Ave | Warrensville Heights | 44122-6818 | 8/19/04 | |
| Tanya | I | Mitchell | | 19456 Brookfield Ln | Warrensville Heights | 44122-7029 | 8/19/04 | |
| James | A | Freedman | | 24101 Lake Shore Blvd | Euclid | 44123-1225 | 8/19/04 | |

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|-----------|---|------------|----|---------------------------------|------------------|------------|---------|--|
| Walter | E | Neil | | 24101 Lake Shore Blvd | Euclid | 44123-1225 | 8/19/04 | |
| Shankia | D | Lewis | | 24455 Lake Shore Blvd Apt 713 E | Euclid | 44123-1253 | 8/19/04 | |
| Amira | R | Moss | | 24451 Lake Shore Blvd Apt 913 | Euclid | 44123-1254 | 8/19/04 | |
| Jesse | E | Bodnarik | | 24101 Lake Shore Blvd Apt 701A | Euclid | 44123-1268 | 8/19/04 | |
| Stephanie | R | Paulk | | 24455 Lake Shore Blvd E-810 | Euclid | 44123-1273 | 8/20/04 | |
| Bryan | C | Perry | | 861 E 232nd St | Euclid | 44123-2511 | 8/19/04 | |
| Reniro | E | Jackson | | 24101 Lake Shore Blvd Apt 901A | Euclid | 44123-4211 | 8/19/04 | |
| Mackie | A | Dieng | | 24801 Lake Shore Blvd Apt 901B | Euclid | 44123-4232 | 8/19/04 | |
| John | L | Derrico | It | 397 E 222nd St Apt B24 | Euclid | 44123-4701 | 8/19/04 | |
| Heschel | L | Crawford | | 6310 Adair Dr | Brook Park | 4412-3805 | 8/19/04 | |
| Donna | | Smith | | 4657 Warner Rd Apt 2 | Garfield Heights | 44125-1217 | 8/19/04 | |
| Karla | | Harrett | | 4651 Warner Rd 03 | Garfield Heights | 44125-1256 | 8/20/04 | |
| Joshua | A | Liebertum | | 10009 Plymouth Ave | Garfield Heights | 44125-2518 | 8/19/04 | |
| Gregory | D | Lubecki | | 12024 Granger Rd | Garfield Heights | 44125-2935 | 8/19/04 | |
| Donald | | Williams | | 5269 E 126th St | Garfield Heights | 44125-3022 | 8/19/04 | |
| Ashley | | Everett | | 5269 E 126th St | Garfield Heights | 44125-3022 | 8/19/04 | |
| Danielle | S | Coleman | | 5269 E 126th St Apt 202 | Garfield Heights | 44125-3022 | 8/19/04 | |
| Fanny | | Taghiarini | | 12404 Darlington Ave | Garfield Heights | 44125-3751 | 8/19/04 | |
| Eric | R | Desimone | | 12328 Woodward Blvd | Garfield Heights | 44125-3811 | 8/19/04 | |
| Tyronne | I | Taylor | | 13709 Eastwood Blvd | Garfield Heights | 44125-3918 | 8/19/04 | |
| Tiere | L | Brubaker | | 5747 Turney Rd | Garfield Heights | 44125-4065 | 8/19/04 | |
| Monica | M | Brown | | 4932 E 141st St 302-B | Garfield Heights | 44125-5058 | 8/19/04 | |
| Steven | M | Bauch | | 13312 Rockside Rd | Garfield Heights | 44125-5168 | 8/19/04 | |
| John | L | Dalorio | | 10007 Parkview Ave DN | Garfield Heights | 44125-6304 | 8/19/04 | |
| Maria | | Klippel | | 22000 Westwood Rd | Fairview Park | 44126-1002 | 8/19/04 | |
| Anna | C | Lupson | | 4209 W 223rd St | Fairview Park | 44126-1019 | 8/19/04 | |
| Helga | K | Foln | | 21477 Mastick Rd | Fairview Park | 44126-3050 | 8/19/04 | |
| Isela | | Vega | | 3166 E 49th St | Cleveland | 44127-1050 | 8/19/04 | |
| Richard | J | Thompson | | 4511 Lester Ave | Cleveland | 44127-1163 | 8/19/04 | |
| Sena | M | Benefield | | 4960 Broadway Ave | Cleveland | 44127-1169 | 8/19/04 | |
| Terri | | Green | | 3467 E 53rd St | Cleveland | 44127-1653 | 8/20/04 | |
| Keaina | D | Johnson | | 5786 Portage Ave | Cleveland | 44127-1710 | 8/20/04 | |
| Renee | E | Bartos | | 5889 Cable Ave | Cleveland | 44127-1724 | 8/20/04 | |
| Lawrence | L | Formby | | 5801 Portage Ave | Cleveland | 44127-1739 | 8/20/04 | |
| Vincent | L | Johnson | | 3311 E 65th St | Cleveland | 44127-1902 | 8/19/04 | |
| Thomas | | Anthony | | 3395 E 70th St | Cleveland | 44127-2002 | 8/19/04 | |
| Stewart | | Graham | | 3411 E 70th St | Cleveland | 44127-2004 | 8/19/04 | |

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|-----------|---|-------------|----|------------------------|----------------------|------------|---------|--|
| Joe | S | Casalicchio | | 3468 E 70th St | Cleveland | 44127-2005 | 8/19/04 | |
| George | E | Mynatt | | 3449 E 69th St | Cleveland | 44127-2035 | 8/19/04 | |
| David | P | Thompson | | 3768 E 142nd St | Cleveland | 44128-1007 | 8/19/04 | |
| Marcus | A | Randle | | 3794 E 143rd St | Cleveland | 44128-1011 | 8/19/04 | |
| Michael | | Blue | | 3842 E 144th St | Cleveland | 44128-1017 | 8/19/04 | |
| Ebony | M | Jefferson | | 14415 Edgewood Ave | Cleveland | 44128-1051 | 8/19/04 | |
| Dannell | D | Jackson | | 14120 Glendale Ave | Cleveland | 44128-1066 | 8/19/04 | |
| Ollica | E | Lyons | | 3859 E 149th St | Cleveland | 44128-1103 | 8/19/04 | |
| Robert | | Howard | | 3775 E 154th St | Cleveland | 44128-1113 | 8/20/04 | |
| Dericka | V | Gale | | 3817 E 154th St 4 | Cleveland | 44128-1115 | 8/19/04 | |
| Terri | A | Smith | | 3996 E 148th St | Cleveland | 44128-1151 | 8/19/04 | |
| Crystal | L | McCurry | | 3940 E 153rd St | Cleveland | 44128-1167 | 8/19/04 | |
| James | C | William | Je | 15609 Walden Ave | Cleveland | 44128-1246 | 8/20/04 | |
| Tony | | Myron | | 16306 Throckley Ave | Cleveland | 44128-1376 | 8/20/04 | |
| Janes | L | Hunt | | 17316 Stockbridge Ave | Cleveland | 44128-1727 | 8/20/04 | |
| Ramous | D | Lewis | | 4131 E 142nd St | Cleveland | 44128-1811 | 8/20/04 | |
| Wydcell | I | Jordan | | 4115 E 145rd St | Cleveland | 44128-1817 | 8/20/04 | |
| Thomas | M | Schervish | | 4067 E 146th St | Cleveland | 44128-1825 | 8/20/04 | |
| John | D | Jones | | 4401 E 142nd St | Cleveland | 44128-2307 | 8/20/04 | |
| Jonathan | E | Smith | | 14118 Miles Ave | Cleveland | 44128-2329 | 8/19/04 | |
| Zedphery | | Williams | | 4345 Lee Rd | Cleveland | 44128-2400 | 8/19/04 | |
| Ronald | C | Favors | | 4305 E 164th St | Cleveland | 44128-2411 | 8/19/04 | |
| Jeremy | L | Smith | | 4380 E 154th St 2 | Cleveland | 44128-2907 | 8/19/04 | |
| Cleatrice | | Copeland | | 4477 E 154th St | Cleveland | 44128-2908 | 8/19/04 | |
| Charlie | | Baltimore | | 4394 E 156th St | Cleveland | 44128-2911 | 8/19/04 | |
| Timothy | | Perry | | 15974 Seville Rd | Cleveland | 44128-3067 | 8/19/04 | |
| Jayson | K | Bolden | | 16802 Palda Dr | Cleveland | 44128-3329 | 8/19/04 | |
| Mary | | Hudson | | 17822 Miles Rd | Warrensville Heights | 44128-3431 | 8/19/04 | |
| Phillip | J | Barker | | 16913 Langly Ave | Cleveland | 44128-3609 | 8/19/04 | |
| James | | Braxton | | 16742 Glenpark Ave | Cleveland | 44128-3666 | 8/19/04 | |
| Anthony | | Johnson | | 16215 Bryce Ave | Cleveland | 44128-3701 | 8/19/04 | |
| Vashon | R | Kellom | | 17225 Takington Ave | Cleveland | 44128-3725 | 8/20/04 | |
| Adda | A | Stokes | | 4317 Northfield d | Warrensville Heights | 44128-4666 | 8/19/04 | |
| Sandy | | Welch | | 4421 Granada Blvd 1. | Warrensville Heights | 44128-4823 | 8/20/04 | |
| Darren | S | Shitley | | 4862 Walford Rd Apt 16 | Warrensville Heights | 44128-5108 | 8/20/04 | |
| David | B | Peoples | | 4793 Walford Rd | Warrensville Heights | 44128-5125 | 8/19/04 | |
| William | | Stewart | | 4958 Caroline Dr | Warrensville Heights | 44128-5300 | 8/19/04 | |

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|-------------|---|-------------|-----|----------------------------|----------------------|------------|---------|-----------------|
| Monica | T | Bowman | | 23755 Banbury Cir | Warrensville Heights | 44128-5308 | 8/19/04 | house |
| Glen | | Mack | | 4901 Banbury Ct | Warrensville Heights | 44128-5332 | 8/20/04 | no record found |
| Robert | L | Robinson | | 4925 Banbury Ct | Warrensville Heights | 44128-5340 | 8/19/04 | house |
| Chauncy | L | McDowell | | 4680 Country Ln | Warrensville Heights | 44128-5813 | 8/19/04 | condo apt |
| Jimnie | N | Lassiter | | 4680 Country Ln | Warrensville Heights | 44128-5813 | 8/19/04 | condo apt |
| Cordell | S | Dixon | | 4681 Country Ln NA | Warrensville Heights | 44128-5859 | 8/19/04 | apartment |
| Richie | | Huffman | III | 4731 Country Ln | Warrensville Heights | 44128-5862 | 8/19/04 | apartment |
| Janita | A | Davis | | 4756 Country Ln | Warrensville Heights | 44128-5865 | 8/19/04 | apartment |
| Abraham | I | Hutchinson | | 4800 Country Ln | Warrensville Heights | 44128-5868 | 8/19/04 | no record found |
| Matie | L | Leverett | | 4800 Country Ln | Warrensville Heights | 44128-5868 | 8/19/04 | apartment |
| Anibel | S | Braceta | | 4800 Country Ln | Warrensville Heights | 44128-5868 | 8/20/04 | apartment |
| Shalaina | I | Gooden | | 4421 Granada Blvd Apt 421 | Warrensville Heights | 44128-6002 | 8/19/04 | apartment |
| Tyrone | D | Rembert | | 4490 Granada Blvd Apt 14 | Warrensville Heights | 44128-6016 | 8/19/04 | apartment |
| Central | I | Perkins | | 4480 Granada Blvd | Warrensville Heights | 44128-6032 | 8/19/04 | apartment |
| Thelma | I | Sanders | III | 4470 Granada Blvd | Warrensville Heights | 44128-6034 | 8/19/04 | apartment |
| Horace | I | Sanders | | 4470 Granada Blvd | Warrensville Heights | 44129-1010 | 8/20/04 | apartment |
| Ryan | C | Valenjevick | | 5230 Knollwood Dr Apt 4 | Parma | 44129-1023 | 8/19/04 | apartment |
| Roberta | K | Mundorff | | 5267 Knollwood Dr | Parma | 44129-1023 | 8/19/04 | apartment |
| John | I | Piura | | 5346 Knollwood Dr Apt 4 | Parma | 44129-1613 | 8/19/04 | apartment |
| Mathew | I | Gibson | | 5439 Knollwood Dr Apt 2 | Parma | 44129-1651 | 8/19/04 | apartment |
| Bryan | C | Hurtless | | 5692 Alber Ave | Parma | 44129-3329 | 8/19/04 | apartment |
| Frank | R | Jameson | | 8201 Thornton Dr | Parma | 44129-3900 | 8/20/04 | apartment |
| Charles | R | Motley | Sr | 6169 Ridge Rd Apt 3 | Parma | 44129-4483 | 8/19/04 | apartment |
| Steven | L | Blekey | | 5703 Sunderland Dr | Parma | 44129-4723 | 8/19/04 | apartment |
| George | I | Wederisch | | 6400 W 564th St | Parma | 44129-5238 | 8/19/04 | apartment |
| Clemmontee | | Colton | | 6841 Day Dr NA | Parma | 44129-5452 | 8/19/04 | apartment |
| Dana | | West | | 8290 Stratford Dr | Parma | 44129-5510 | 8/19/04 | apartment |
| Phillips | I | Epps | | 9631 Elsmere Dr | Parma | 44130-1626 | 8/19/04 | apartment |
| Mike | M | Iones | | 6242 Mariana Dr | Parma Heights | 44130-2836 | 8/19/04 | apartment |
| Deborah | G | Troickiy | | 6395 Old York Rd | Parma Heights | 44130-3023 | 8/19/04 | apartment |
| Rhiana | G | Ring | | 6395 Princeton Ct NA | Parma Heights | 44130-4001 | 8/19/04 | apartment |
| Will | A | Norris | II | 6923 York Rd | Parma Heights | 44130-4549 | 8/19/04 | apartment |
| Ivan | | Martinez | | 9235 N Church Dr Apt 301 | Parma Heights | 44130-4708 | 8/19/04 | apartment |
| Christopher | I | Salta | | 15040 W Sprague Rd Apt J13 | Middleburg Heights | 44130-6990 | 8/19/04 | apartment |
| John | | Newman | | 9840 Pleasant Lake Blvd | Parma | 44130-7441 | 8/19/04 | apartment |
| Michael | G | Grakauskas | | 10277 S Lake Blvd | Parma | 44130-7557 | 8/19/04 | apartment |
| Terrence | D | Thornton | Sr | 10724 W Sprague Rd | Parma | 44130-7709 | 8/19/04 | apartment |

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|-------------|-------|-------------|--------------------------------|--------------------|------------|---------|--|
| Caroline | | Audrey | 7073 W 150th St | Parma Heights | 44130-7825 | 8/19/04 | |
| usan | D | Stojanovic | 7071 W 130th St Apt 231H | Parma Heights | 44130-7911 | 8/19/04 | |
| Christopher | P | Sapf | 6745 Engle Rd | Middleburg Heights | 44130-7993 | 8/19/04 | |
| Dale | M | Glovich | 5671 Chevrolet Blvd Apt 5 | Parma | 44130-8715 | 8/19/04 | |
| Natalie | C | Phillips | 7842 Normandie Blvd | Middleburg Heights | 44130-8814 | 8/19/04 | |
| Andrew | M | Nagy | 11360 Cheyenne Trl 6 | Parma Heights | 44130-9019 | 8/19/04 | |
| Scott | J | Novak | 102 E Schnaf Rd | Brooklyn Heights | 44131-1208 | 8/19/04 | |
| Jason | M | Snider | 1020 E Schnaf Rd | Brooklyn Heights | 44131-1222 | 8/19/04 | |
| Katie | A | Farris | 6353 Gale Dr | Seven Hills | 44131-3126 | 8/19/04 | |
| Naiya | F | Tabbaa | 6434 Chestnut Rd | Independence | 44131-3311 | 8/19/04 | |
| Roger | Willo | Willo | 2917 Shady Ln | Seven Hills | 44131-4333 | 8/19/04 | |
| Ellen | F | Mueller | 7810 Hillside Rd | Independence | 44131-5406 | 8/19/04 | |
| Monica | C | Kirkland | 364 E Pleasant Valley Rd | Seven Hills | 44131-5606 | 8/19/04 | |
| Melissa | S | Cammarata | 7420 Brookside Rd | Independence | 44131-6423 | 8/19/04 | |
| Danika | A | Turnage | 26241 Lake Shore Blvd Apt 563 | Euclid | 44132-1141 | 8/19/04 | |
| Eibony | T | Cooley | 26151 Lake Shore Blvd Apt 1513 | Euclid | 44132-1157 | 8/19/04 | |
| James | D | Montgomery | 26940 Sidney Dr | Euclid | 44132-2902 | 8/19/04 | |
| Jasmine | R | Havey | 26980 Sidney Dr | Euclid | 44132-2953 | 8/19/04 | |
| Michael | A | Jackson | 1251 E 279th St | Euclid | 44132-3068 | 8/19/04 | |
| Elizabeth | M | Heath | 1310 E 279th St 1 | Euclid | 44132-3073 | 8/19/04 | |
| Donne | M | Conard | 27750 Sidney Dr | Euclid | 44132-3095 | 8/19/04 | |
| Jasmine | A | Silva | 27750 Sidney Dr | Euclid | 44132-3151 | 8/19/04 | |
| Grace | Y | Boyd-Elmore | 1442 E 260th St 1620 | Euclid | 44132-3920 | 8/19/04 | |
| Edward | L | Hood | 25111 Lake Shore Blvd Apt 117 | Euclid | 44132-3947 | 8/19/04 | |
| Robert | S | Bergfeld | 8410 Wallings Rd | North Royalton | 44133-2947 | 8/19/04 | |
| Candace | | Gingrich | 12490 State Rd | North Royalton | 44133-3245 | 8/19/04 | |
| Michael | | Koral | 7818 Royalton Rd | North Royalton | 44133-4708 | 8/19/04 | |
| Jeremy | M | Mahon | 16094 Louis Dr | North Royalton | 44133-5514 | 8/19/04 | |
| Jonathan | W | Roblin | 6471 Cady Rd | North Royalton | 44133-6315 | 8/19/04 | |
| Sarah | E | Roberts | 8060 Springfield Dr | North Royalton | 44133-7018 | 8/19/04 | |
| Heidi | M | Pimentel | 8244 Windsor Dr | North Royalton | 44133-7034 | 8/19/04 | |
| Marcus | D | Johnson | 5767 Broadview Rd #108 | Parma | 44134-1681 | 8/19/04 | |
| Robert | L | Allison | 1050 Omalley Dr Apt 203 | Parma | 44134-2035 | 8/19/04 | |
| Brendon | R | McCourt | 3028 Torington Ave | Parma | 44134-2216 | 8/20/04 | |
| Megan | K | Delaney | 3714 Wood Ave | Parma | 44134-2332 | 8/20/04 | |
| Robert | P | Suchon | 3317 Lucerne Ave | Parma | 44134-2631 | 8/19/04 | |
| William | J | Brown | 2518 Starfield Dr | Parma | 44134-5004 | 8/19/04 | |

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|-------------|---|------------|-----|---------------------------|---------------|------------|---------|--|
| George | | Ash | | 2818 Coventry Dr | Parma | 44134-5636 | 8/19/04 | |
| Joseph | A | Mason | | 6800 Sandy Hook Dr | Parma | 44134-6049 | 8/20/04 | |
| Jason | A | Harding | | 7660 Broadway Rd Apt 118 | Parma | 44134-6765 | 8/19/04 | |
| Jose | | Padilla | | 4017 W 150th St | Cleveland | 44135-1301 | 8/19/04 | |
| Sean | | McGlothlin | | 4298 Rocky River Dr | Cleveland | 44135-1951 | 8/19/04 | |
| Anwar | A | Saeed | | 4235 W 146th St | Cleveland | 44135-2005 | 8/19/04 | |
| Edward | E | Harris | | 4178 W 143rd St | Cleveland | 44135-2048 | 8/19/04 | |
| Marci | C | Freeman | | 4121 W 144th St | Cleveland | 44135-2053 | 8/19/04 | |
| Emmanuel | U | Jackson | | 12908 Brookfield Ave | Cleveland | 44135-2230 | 8/19/04 | |
| Richard | L | Daniel | | 4472 W 136th St | Cleveland | 44135-2912 | 8/19/04 | |
| Jason | R | Jackson | | 4541 W 130th St #11 | Cleveland | 44135-3568 | 8/20/04 | |
| Heidemarie | | Crites | | 16204 Melgrave Ave | Cleveland | 44135-4402 | 8/19/04 | |
| Andrew | | Loftren | | 4689 W 146th St | Cleveland | 44135-4501 | 8/19/04 | |
| Claudia | A | Annas | | 11831 Pearl Rd Apt 105 | Strongsville | 44136-3337 | 8/19/04 | |
| James | J | Esarey | | 11831 Pearl Rd Apt 204 | Strongsville | 44136-3337 | 8/19/04 | |
| Toby | D | Johnson | | 16309 Pearl Rd | Strongsville | 44136-6039 | 8/19/04 | |
| Christopher | J | Zawislak | | 16889 Rabbit Run Dr | Strongsville | 44136-6239 | 8/19/04 | |
| Calvin | T | Herron | | 14400 Granger Rd | Maple Heights | 44137-1063 | 8/19/04 | |
| Myah | L | Gray | | 5100 Lee Rd | Maple Heights | 44137-1229 | 8/19/04 | |
| Antonio | | Gaines | | 5361 Beechwood Ave | Maple Heights | 44137-2205 | 8/19/04 | |
| Cami | S | Bell | | 19307 Libby Rd | Maple Heights | 44137-2349 | 8/19/04 | |
| Willie | L | Atkins | | 19414 Maple Heights Blvd | Maple Heights | 44137-2380 | 8/19/04 | |
| David | J | Lee | II | 16510 Maple Heights Blvd | Maple Heights | 44137-2639 | 8/19/04 | |
| Megan | M | Kelley | | 5442 Beechwood Ave | Maple Heights | 44137-2762 | 8/19/04 | |
| Kenneth | | Garth | | 14805 Reddingdon Ave | Maple Heights | 44137-3221 | 8/19/04 | |
| Darnell | E | Walker | | 5678 South Blvd | Maple Heights | 44137-3440 | 8/19/04 | |
| Gerald | L | Jones | | 5471 Dalewood Ave | Maple Heights | 44137-3501 | 8/19/04 | |
| Kalpanaben | C | Patel | | 15300 Maple Park Dr | Maple Heights | 44137-4289 | 8/19/04 | |
| Matthew | M | Piecing | | 27054 Oakwood Dr Apt 103C | Maple Heights | 44138-1190 | 8/20/04 | |
| Valerie | R | Bogucki | | 8562 Oakridge Dr | Olmsted Falls | 44138-1865 | 8/19/04 | |
| Alex | | Rinaldi | | 23704 Sawmill Bnd | Olmsted Falls | 44138-2895 | 8/20/04 | |
| Herman | N | Rudolph | | 32593 Haver Hill Dr | Solon | 44139-1970 | 8/20/04 | |
| Kathryn | W | Phillips | | 27104 Normandy Rd | Bay Village | 44140-2328 | 8/19/04 | |
| Michael | J | Pugacz | | 489 Canterbury Rd | Bay Village | 44140-2408 | 8/19/04 | |
| Jason | G | Crisp | | 24451 Lake Rd 604 | Bay Village | 44140-2960 | 8/19/04 | |
| Steve | N | Csanai | | 24455 Lake Rd #1105 | Bay Village | 44140-2960 | 8/19/04 | |
| Michael | D | Bilan | III | 7787 Grandier Ln | Brecksville | 44141-1037 | 8/20/04 | |

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|-------------|---|-------------|---------------------------|------------------|------------|---------|--|
| Hosey | | Amos | 8757 Brecksville Rd | Brecksville | 44141-1919 | 8/19/04 | |
| Richard | | Barkley | 8757 Brecksville Rd | Brecksville | 44141-1919 | 8/19/04 | |
| Ray | | Williams | 10000 Brecksville Rd | Brecksville | 44141-3204 | 8/20/04 | |
| Pamela | D | Rawls | 10000 Brecksville Rd | Brecksville | 44141-3204 | 8/20/04 | |
| Darrel | | Biggs | 10000 Brecksville Rd | Brecksville | 44141-3204 | 8/20/04 | |
| Joseph | L | Drachenberg | 10000 Brecksville Rd | Brecksville | 44141-3204 | 8/20/04 | |
| Erica | A | Olson | 2821 Boston Rd | Brecksville | 44141-3313 | 8/19/04 | |
| Terrill | S | Byers | 21930 Sheldon Rd Apt 201 | Brook Park | 44142-1221 | 8/19/04 | |
| Gary | D | Showers | 6008 Engle Rd | Brook Park | 44142-2101 | 8/20/04 | |
| Michael | S | Lundy | 6004 Engle Rd | Brook Park | 44142-2102 | 8/20/04 | |
| Wanda | | Lupina | 5808 W 130th St | Brook Park | 44142-2601 | 8/19/04 | |
| George | M | Harris | 6225 Adair Ct | Brook Park | 44142-3059 | 8/19/04 | |
| Richard | B | Graves | 14333 Park Dr | Brook Park | 44142-3849 | 8/19/04 | |
| George | B | Raby | 137 Ruth Ellen Dr Apt 107 | Richmond Heights | 44143-1006 | 8/19/04 | |
| Somerae | R | Simmons | 145 Chestnut Ln Apt 220 | Richmond Heights | 44143-1012 | 8/19/04 | |
| Tiffany | D | Figuerola | 26645 Sandy Hill Dr | Richmond Heights | 44143-1049 | 8/19/04 | |
| Royce | E | Walker | 324 Bridgeport Trl | Richmond Heights | 44143-1464 | 8/19/04 | |
| Mike | F | Cochran | 446 Richmond Park E | Richmond Heights | 44143-1813 | 8/19/04 | |
| Charles | J | Halco | 4211 Fulton Pkwy Apt 123 | Cleveland | 44144-1962 | 8/19/04 | |
| Alexis | | Olmeda | 8257 Memphis Ave NA | Brooklyn Heights | 44144-2115 | 8/19/04 | |
| Anthony | R | Ezzo | 4683 Winter Ln | Brooklyn | 44144-2409 | 8/20/04 | |
| Faris | R | Antoon | 4416 W 53rd St UP | Cleveland | 44144-2908 | 8/19/04 | |
| Jennifer | S | Trotter | 5100 Vandala Ave | Cleveland | 44144-3909 | 8/19/04 | |
| Wayne | A | Bateman | 27676 Westchester Pkwy | Westlake | 44145-1219 | 8/19/04 | |
| Catherine | | Sinnott | 27601 Westchester Pkwy | Westlake | 44145-1251 | 8/19/04 | |
| Deborah | A | Smith | 1310 Bobby Ln Apt 307 | Westlake | 44145-6903 | 8/20/04 | |
| Cozy | M | Guyton | 5303 Northfield Rd | Bedford Heights | 44146-1104 | 8/19/04 | |
| Marselene | P | Norton | 21861 Libby Rd D 24 | Bedford Heights | 44146-1204 | 8/19/04 | |
| Timmie | L | Norris | 22610 Libby Rd 304 | Bedford Heights | 44146-1239 | 8/19/04 | |
| Angela | | Golden | 22155 Libby Rd | Bedford Heights | 44146-1288 | 8/19/04 | |
| Lakeisha | M | Brown | 25021 Aurora Rd | Bedford Heights | 44146-1767 | 8/19/04 | |
| Bamah | S | Church | 25400 Rockside Rd Apt 405 | Bedford Heights | 44146-1913 | 8/19/04 | |
| Jessica | M | Hill | 25300 Rockside Rd Apt 514 | Bedford Heights | 44146-1920 | 8/19/04 | |
| Kristina | A | Stahl | 25400 Rockside Rd | Bedford Heights | 44146-1932 | 8/19/04 | |
| Christophet | W | Gray | 25300 Rockside Rd 10 | Bedford Heights | 44146-1940 | 8/19/04 | |
| Chanana | C | Adams | 25200 Rockside Rd | Bedford Heights | 44146-1941 | 8/19/04 | |
| Terrance | J | Jenkins | 25200 Rockside Rd | Bedford Heights | 44146-1941 | 8/19/04 | |

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|-----------|---|-------------|----|---------------------------|-----------------|------------|---------|--|
| Richard | A | Smolk | Jr | 433 Broadway Ave 01 | Bedford | 44146-2628 | 8/19/04 | |
| Alonzo | G | Ort | | 481 Broadway Ave Apt 4 | Bedford | 44146-2719 | 8/19/04 | |
| Markus | A | Jones | | 5988 Bear Creek Dr | Bedford Heights | 44146-2932 | 8/19/04 | |
| Phillip | R | Littleton | | 6395 S Perkins Rd | Bedford Heights | 44146-3157 | 8/19/04 | |
| Ryan | L | Brandenburg | | 450 Turney Rd | Bedford | 44146-3360 | 8/19/04 | |
| Michael | T | Hannan | | 128 Forest Dr | Bedford | 44146-3533 | 8/20/04 | |
| Richelle | | Leverett | | 66 Union St | Bedford | 44146-4522 | 8/19/04 | |
| Carlos | | Cole | | 137 Union St | Bedford | 44146-4541 | 8/19/04 | |
| James | R | Copley | | 26463 Solon Rd Apt 512 | Bedford | 44146-4733 | 8/19/04 | |
| Catherine | M | Lehota | | 26463 Solon Rd Apt 513 | Bedford | 44146-4733 | 8/19/04 | |
| Anthony | | Diglio | | 26433 Solon Dr | Bedford | 44146-4749 | 8/19/04 | |
| John | H | Young | | 26433 Solon Rd | Bedford | 44146-4749 | 8/19/04 | |
| Tamika | M | Williams | | 26463 Solon Rd | Bedford | 44146-4761 | 8/19/04 | |
| Cleveland | W | Gilmore | | 6628 Tamarind Dr | Bedford Heights | 44146-4843 | 8/19/04 | |
| Clarence | | Miller | | 7312 Kentucky Dr | Bedford | 44146-5701 | 8/19/04 | |
| Andre | A | Wilson | | 22135 Libby Rd | Bedford Heights | 44146-6815 | 8/19/04 | |
| Timothy | L | Owens | | 19655 Rockside Rd | Bedford | 44146-7203 | 8/19/04 | |
| George | E | Brooks | | 19655 Rockside Rd | Bedford | 44146-7203 | 8/19/04 | |
| Robin | S | Adams | | 1654 E Royallon Rd #3 | Bedford | 44147-2549 | 8/19/04 | |
| Barndon | | Lee | | 1637 Valley Parkway Dr | Bedford | 44147-3052 | 8/19/04 | |
| Roger | A | Slevens | | 1000 Vineyard Dr | Bedford | 44147-3392 | 8/19/04 | |
| Claudia | K | Ortiz | | 1389 Apple Valley Ct | Bedford | 44147-3640 | 8/19/04 | |
| Theresa | C | Elber | | 1295 Cloverberry Ct | Bedford | 44147-3685 | 8/19/04 | |
| Thomas | | Timmings | | 1700 Seneca Blvd #103 | Bedford | 44147-3911 | 8/20/04 | |
| Mary | | Lauren | | 20052 Idlewood Trl | Bedford | 44147-3142 | 8/20/04 | |
| Julie | B | Anderson | | 20466 Westwood Dr | Bedford | 44149-3901 | 8/20/04 | |
| Nicholas | | Flanagan | | 20448 Scott Dr | Bedford | 44149-4989 | 8/19/04 | |
| Albert | A | Salim | | 17171 Greenwood Dr | Bedford | 44149-5826 | 8/19/04 | |
| Tierra | D | Barnes | | 1356 E 131st St | Bedford | | 8/18/04 | |
| Charles | | Tompkins | | 13995 Superior Rd Apt 510 | Bedford | | 8/19/04 | |
| Dannell | F | Boylan | | 13995 Superior Rd Apt 704 | Bedford | | 8/19/04 | |
| Adam | S | Wilcox | | 1834 W 54th St | Bedford | | 8/20/04 | |
| Molly | T | Daw | | 2862 Corydon Rd | Bedford | | 8/19/04 | |
| Holly | M | Teron | | 622 North St | Bedford | | 8/19/04 | |

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Exhibit 4

Cuyahoga County

Info Key: CF (couldn't find), VR (verified residential), P (photo), B (Business), O (Other)

| FIRST | MID | LAST | SUF | ADDRESS 1 | CITY | ZIP | DATE | INFO/NOTES |
|------------|-----|-------------|-----|--------------------------|----------------|-------|---------|------------|
| | | | | | | | | |
| Nile | D | Smith | | 114 Tressel St | Berea | 44017 | 8/19/04 | |
| Joshua | S | Sheppard | | 114 Tressel St 105 | Berea | 44017 | 8/19/04 | |
| Jonathan | | Babic | | 144 Tressel St | Berea | 44017 | 8/19/04 | |
| John | M | Mason | III | 144 Tressel St 305 | Berea | 44017 | 8/19/04 | |
| Nicole | M | Wendling | | 171 E Center St | Berea | 44017 | 8/19/04 | |
| Dana | C | Hammond | | 171 E Center St 238 | Berea | 44017 | 8/19/04 | |
| Stephanie | L | Griffin | | 253 Beech St | Berea | 44017 | 8/19/04 | |
| Emily | T | Roll | | 253 Beech St | Berea | 44017 | 8/19/04 | |
| Audry | | Leonard | | 309 Beech St | Berea | 44017 | 8/19/04 | |
| Lauren | E | Weilan | | 309 Beech St #NH | Berea | 44017 | 8/19/04 | |
| Alana | C | Iochum | | 65 Seminary St | Berea | 44017 | 8/19/04 | |
| Charles | E | Spradley | III | 77 W Bagley Rd 107 | Berea | 44017 | 8/19/04 | |
| Morgan | E | Schreiber | | 3715 Greenwood Dr | Moreland Hills | 44022 | 8/19/04 | |
| John | A | Rutter | III | 3740 Greenwood Dr | Moreland Hills | 44022 | 8/19/04 | |
| Patrick | E | Myers | | 1359 W 93rd St | Cleveland | 44102 | 8/20/04 | |
| Orrie | M | Lewis | | 1427 W 84th St | Cleveland | 44102 | 8/20/04 | |
| A wianette | S | Ford | | 1539 W 65th St | Cleveland | 44102 | 8/19/04 | |
| Rafael | | Hernandez | | 1842 W 77th St | Cleveland | 44102 | 8/19/04 | |
| Phillip | L | Harris | | 1892 W 54th St | Cleveland | 44102 | 8/20/04 | |
| Guillermo | | Torres | | 4512 Lorain Ave | Cleveland | 44105 | 8/20/04 | |
| Detaz | | Butterfield | | 116 Harvard Ave | Cleveland | 44105 | 8/20/04 | |
| Mary | | King | | 1946 W 47th st | Cleveland | 44105 | 8/20/04 | |
| Tommy | I | Foster | | 10621 Orville Ave | Cleveland | 44106 | 8/19/04 | |
| Alesha | L | Rice | | 2380 Parkway Dr J | Lakewood | 44107 | 8/19/04 | |
| Crystal | | Gillo | | 11112 Lake Shore Blvd | Bratenahl | 44108 | 8/19/04 | |
| Michael | C | Jordan | | 16921 Lake Shore Blvd | Cleveland | 44110 | 8/19/04 | |
| Ronald | H | Newberry | Jr | 10727 Bellare Rd Apr 201 | Cleveland | 44111 | 8/19/04 | |
| Bill | D | Smith | | 1234 W 10th St | Cleveland | 44113 | 8/19/04 | |
| Sharnice | M | Henderson | | 1500 W 9th St | Cleveland | 44113 | 8/19/04 | |
| Ohmisi | | Marshall | | 1892 Detroit Ave #805 | Cleveland | 44113 | 8/19/04 | |
| Britt | L | Williams | | 2000 Washington Ave #209 | Cleveland | 44113 | 8/19/04 | |
| Ismael | | Perez | | 3378 Franklin Blvd | Cleveland | 44113 | 8/20/04 | |

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| | | | | | | | | |
|-----------|---|----------------|-----|----------------------------|----------------------|------------|---------|--|
| Johnny | V | Marciano | | 3712 Detroit Ave 17 | Cleveland | 44113 | 8/19/04 | |
| Anthony | D | Hines | | 1637 E 18th St | Cleveland | 44114 | 8/19/04 | |
| Willow | D | White | | 2130 Euclid Ave | Cleveland | 44115 | 8/19/04 | |
| Sharonda | A | Bailey | | 1034 Lake Rd | Rocky River | 44116 | 8/19/04 | |
| Larasha | J | Harris | | 1390 Lake Rd | Rocky River | 44116 | 8/19/04 | |
| Nancy | J | Toigo | | 16700 Lake Rd 506 | Rocky River | 44116 | 8/19/04 | |
| Roderick | G | MacBain | | 2100 Lake Rd | Rocky River | 44116 | 8/20/04 | |
| Donald | J | Probert | | 850 Smith Ct | Rocky River | 44116 | 8/19/04 | |
| Tiffany | R | Pleasure | | 11615 N Park Blvd | Cleveland | 44118 | 8/19/04 | |
| Amber | B | Williams | | 13896 Superior Rd 9 | East Cleveland | 44118 | 8/19/04 | |
| Toya | | Davis-Hamilton | | 17913 Brazil Rd | Cleveland | 44119 | 8/20/04 | |
| Fawaz | H | El-Khatib | | 1716 S Lyn Cir | South Euclid | 44121 | 8/19/04 | |
| Erik | D | Schloss | | 27075 Shaker Blvd | Beachwood | 44122 | 8/19/04 | |
| Rumph | J | Hollis | | 4345 Lee Rd | Cleveland | 44122 | 8/20/04 | |
| Kelly | R | Jacko | | 28266 Northwood Dr | Pepper Pike | 44124 | 8/20/04 | |
| Manuel | L | Hudson | | 3925 E 144th St | Cleveland | 44128 | 8/20/04 | |
| Donte | M | Peterson | | 4380 E 154th | Cleveland | 44128 | 8/19/04 | |
| Laurence | D | Byrd | III | 4807 Lawrence Dr | Warrensville Heights | 44129 | 8/19/04 | |
| Barbara | H | Walters | | 7988 Lakeview Dr | Parma | 44129 | 8/19/04 | |
| Lydia | C | Emerson | | 19709 Wendy Dr | Middleburg Heights | 44130 | 8/19/04 | |
| Trista | N | Hoon | | 6658 Stoney Creek Dr | North Royalton | 44133 | 8/19/04 | |
| Esta | M | Warren | | 6484 State Rd D-4 | Parma | 44134 | 8/19/04 | |
| David | M | Orges | | 6900 State Rd 120 | Parma | 44134 | 8/19/04 | |
| Phil | M | Reed | II | 11335 Central Park Blvd UP | Olmsted Falls | 44138 | 8/19/04 | |
| Randy | L | Robinson | | 25397 Locust Dr | Olmsted Falls | 44138 | 8/19/04 | |
| Alanna | M | Foglietti | | 6625 Chagrin River Rd | Solon | 44139 | 8/19/04 | |
| Steve | V | Thompson | | 1990 Millard Dr | Bay Village | 44140 | 8/19/04 | |
| Heidi | M | McGuire | | 3265 Millard Dr | Bay Village | 44140 | 8/19/04 | |
| Merleen | M | Franks | | 3272 Millard Dr #5 | Bay Village | 44140 | 8/19/04 | |
| Joseph | L | Turnage | | 5988 Engle Rd | Brook Park | 44142 | 8/20/04 | |
| Bertha | | Hall | | 1917 Longspur Rd | Highland Heights | 44143 | 8/19/04 | |
| Kenneth | | Pope | | 629 Locke Dr | Highland Heights | 44143 | 8/19/04 | |
| Mark | D | Williams | | 26463 Solon Rd Club 111 | Oakwood | 44146 | 8/19/04 | |
| Tamara | D | Keeton | | 9242 Stafford Dr | Strongsville | 44149 | 8/19/04 | |
| Tamara | D | Keeton | | 9424 Stafford Dr | Strongsville | 44149 | 8/19/04 | |
| Demetrius | | Blackwell | | 1717 W 58th St | Cleveland | 44402 | 8/19/04 | |
| David | A | King | | 5960 Engle Rd | Brook Park | 44224-2136 | 8/19/04 | |

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|-------------|---|------------|--------------------------|---------------|------------|---------|--|
| Daniel | | Harmon | 889 Arden Ave | Berea | 44017-1168 | 8/19/04 | |
| Joshua | S | Landis | 244 Barbary Dr | Berea | 44017-1206 | 8/19/04 | |
| Yelena | | Gagnipw | 188 Edgewood Dr UP | Berea | 44017-1412 | 8/19/04 | |
| Alison | D | Dejesus | 654 Front St | Berea | 44017-1607 | 8/19/04 | |
| Michelle | A | Erdman | 80 Emerson Dr | Berea | 44017-1676 | 8/19/04 | |
| Nicole | Y | Hanible | 22 W 5th Ave Apt C1 | Berea | 44017-1740 | 8/19/04 | |
| John | L | Feldman | 375 Front St Apt A8 | Berea | 44017-1742 | 8/20/04 | |
| James | L | Boles | 287 W Bagley Rd | Berea | 44017-1865 | 8/19/04 | |
| Mary | C | Dumont | 210 Mulberry St Apt 22 | Berea | 44017-1869 | 8/20/04 | |
| Eddie | J | Wright | 100 Front St P | Berea | 44017-1913 | 8/19/04 | |
| Christopher | R | Fouser | 205 Front St | Berea | 44017-1921 | 8/19/04 | |
| Laura | T | Cleveland | 616 Falls Rd | Chagrin Falls | 44022-2561 | 8/19/04 | |
| Christopher | L | Cessari | 63 E Summit St | Chagrin Falls | 44022-2709 | 8/20/04 | |
| Edward | W | Smith | 196 Vincent St | Chagrin Falls | 44022-2951 | 8/20/04 | |
| Robin | | Carter | 38 S Franklin St | Chagrin Falls | 44022-3213 | 8/19/04 | |
| ildred | Y | Lee | 2859 Community Dr | Chagrin Falls | 44022-6678 | 8/19/04 | |
| Paul | W | Yowell | 7926 Madison Ave | Cleveland | 44102-1058 | 8/20/04 | |
| Mark | | White | 1333 W 114th St | Cleveland | 44102-1307 | 8/19/04 | |
| Juan | A | Mays | 1355 W 116th St | Cleveland | 44102-1329 | 8/19/04 | |
| Mohan | | Vasa | 1361 W 114th St | Cleveland | 44102-1353 | 8/19/04 | |
| Dustin | M | Small | 1819 W 45th St | Cleveland | 44102-1450 | 8/19/04 | |
| Jason | S | Brisentine | 11011 Clifton Blvd | Cleveland | 44102-1532 | 8/20/04 | |
| Erin | M | Pryor | 10710 Clifton Blvd | Cleveland | 44102-1547 | 8/19/04 | |
| Christopher | H | Antonini | 10710 Clifton Blvd 1 | Cleveland | 44102-1547 | 8/19/04 | |
| Keith | R | Jewell | 1380 W 111th St | Cleveland | 44102-1552 | 8/19/04 | |
| Juanita | R | Fudge | 1380 W 111th St Apt 201 | Cleveland | 44102-1552 | 8/19/04 | |
| Dante | M | Smith | 1220 W 104th St Apt 303 | Cleveland | 44102-1557 | 8/19/04 | |
| Charla | | Malloy | 1309 W 103rd St | Cleveland | 44102-1622 | 8/19/04 | |
| Randall | T | Hunt | 1323 W 95th St | Cleveland | 44102-1712 | 8/19/04 | |
| Karina | L | Hope | 1440 W 85th St UP | Cleveland | 44102-1820 | 8/20/04 | |
| Dennis | L | Brown | 1448 W 85th St | Cleveland | 44102-1820 | 8/20/04 | |
| James | | Washington | 1375 W 87th St UP | Cleveland | 44102-1823 | 8/20/04 | |
| Janine | M | Douglas | 1316 W 87th St | Cleveland | 44102-1824 | 8/19/04 | |
| Henry | J | Burry | 1314 W 93rd St | Cleveland | 44102-1836 | 8/20/04 | |
| Samantha | L | Bunting | 1453 W 85th St Apt 6 | Cleveland | 44102-1839 | 8/20/04 | |
| Melissa | L | Burnett | 9505 Detroit Ave 905 | Cleveland | 44102-1851 | 8/20/04 | |
| Jason | | Vicario | 9520 Detroit Ave Apt 202 | Cleveland | 44102-1869 | 8/19/04 | |

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| Muhammad | A | Haliz | | 9520 Detroit Ave Apt 1013 | Cleveland | 44102-1873 | 8/19/04 | |
| Charlesine | E | Green | | 1361 W 91st St Apt 10 | Cleveland | 44102-1882 | 8/20/04 | |
| Myron | D | Watts | | 1360 W 80th St | Cleveland | 44102-1901 | 8/20/04 | |
| Jason | L | Weaver | | 1339 W 83rd St 12 | Cleveland | 44102-1905 | 8/19/04 | |
| Jason | | Williams | | 1394 W 83rd St | Cleveland | 44102-1906 | 8/19/04 | |
| James | C | Luster | | 1372 W 83rd St | Cleveland | 44102-1941 | 8/20/04 | |
| David | | Raynos | | 1359 W 83rd St | Cleveland | 44102-1945 | 8/20/04 | |
| Maurice | A | Davis | Jr | 1359 W 83rd St 15 | Cleveland | 44102-1945 | 8/20/04 | |
| Marlena | M | Malcolm | | 8107 Lake Ave | Cleveland | 44102-1956 | 8/19/04 | |
| Kim | | Perchinski | | 8013 Lake Ave | Cleveland | 44102-1958 | 8/19/04 | |
| Edward | L | Hill | | 1378 W 83rd St | Cleveland | 44102-1965 | 8/19/04 | |
| Linda | M | Hayes | | 7405 Herman Ave | Cleveland | 44102-2038 | 8/19/04 | |
| Estanislao | T | Ortiz | | 1331 W 70th St | Cleveland | 44102-2059 | 8/19/04 | |
| Kevin | R | Ditka | II | 1265 W 58th St | Cleveland | 44102-2145 | 8/19/04 | |
| Anthony | D | Thompson | | 11410 Detroit Ave | Cleveland | 44102-2316 | 8/19/04 | |
| Kenneth | J | Humphries | Jr | 1419 W 112th St A | Cleveland | 44102-2347 | 8/19/04 | |
| Kene | | Johnson | | 1405 W 114th St | Cleveland | 44102-2362 | 8/19/04 | |
| Edward | | Ondreff | | 1472 W 112th St | Cleveland | 44102-2364 | 8/19/04 | |
| Andre | R | Foster | | 11210 Detroit Ave | Cleveland | 44102-2406 | 8/19/04 | |
| Laroyal | I | Underwood | | 1417 W 107th St Apt 2 | Cleveland | 44102-2419 | 8/20/04 | |
| Roy | C | Soto | | 11118 Detroit Ave Apt 304 | Cleveland | 44102-2439 | 8/19/04 | |
| Steven | | Mitchell | | 11110 Detroit Ave | Cleveland | 44102-2449 | 8/19/04 | |
| Jessica | M | Edwards | | 8805 Madison Ave Apt 4 | Cleveland | 44102-2751 | 8/19/04 | |
| Aaron | | Marinelli | | 8206 Detroit Ave | Cleveland | 44102-2843 | 8/20/04 | |
| Anna | L | Williams | | 8003 Detroit Ave | Cleveland | 44102-2854 | 8/19/04 | |
| Tito | J | Ruiz | | 1452 W 75th St | Cleveland | 44102-2902 | 8/19/04 | |
| Michelle | A | Moran | | 6514 W Cinton Ave | Cleveland | 44102-2906 | 8/19/04 | |
| Nickie | | Young | | 6915 Franklin Blvd 2 | Cleveland | 44102-2917 | 8/19/04 | |
| Nickie | M | Young | | 6915 Franklin Blvd 2 | Cleveland | 44102-2917 | 8/19/04 | |
| Charles | N | Mixon | | 1978 W 75th St | Cleveland | 44102-2942 | 8/20/04 | |
| Salina | | Jones | | 7409 Franklin Blvd Apt 2 | Cleveland | 44102-2965 | 8/19/04 | |
| Miguel | | Saucedo | Jr | 1435 W 57th St | Cleveland | 44102-3043 | 8/19/04 | |
| Bennett | E | Fox | | 6009 Bridge Ave | Cleveland | 44102-3118 | 8/20/04 | |
| Christopher | L | Lawson | | 1812 W 57th St | Cleveland | 44102-3209 | 8/19/04 | |
| Cedric | B | Jackson | Sr | 1812 W 57th St | Cleveland | 44102-3209 | 8/19/04 | |
| Tito | | Cancy | | 1908 W 57th St | Cleveland | 44102-3213 | 8/19/04 | |
| Edilberto | | Morals | | 5516 Lorain Ave | Cleveland | 44102-3236 | 8/19/04 | |

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|-----------|---|-------------|-----------------------|-----------|------------|---------|--|
| Jason | | Jones | 5309 Bridge Ave | Cleveland | 44102-3347 | 8/19/04 | |
| Gloria | S | Mejia | 4805 Lorain Ave B | Cleveland | 44102-3351 | 8/19/04 | |
| Ricardo | L | Glen | 1453 W 48th St 3 | Cleveland | 44102-3359 | 8/19/04 | |
| Jonathan | D | Williams | 1949 W 52nd St UP | Cleveland | 44102-3366 | 8/19/04 | |
| Edmanuel | | Sosa | 4828 Lorain Ave | Cleveland | 44102-3376 | 8/20/04 | |
| Carlos | O | Perez | 4719 Bridge Ave | Cleveland | 44102-3423 | 8/19/04 | |
| Sam | T | Thomas | 1958 W 48th St | Cleveland | 44102-3437 | 8/19/04 | |
| Tracie | | Johnson | 1947 W 47th St | Cleveland | 44102-3454 | 8/19/04 | |
| Domonique | S | King | 1947 W 47th St Apt 3 | Cleveland | 44102-3454 | 8/19/04 | |
| Donna | | Mars | 1947 W 47th St Apt 5 | Cleveland | 44102-3454 | 8/19/04 | |
| Johnnie | B | Smith | 2023 W 105th St Apt 1 | Cleveland | 44102-3553 | 8/19/04 | |
| Samuel | P | Thomas | 2036 W 98th St | Cleveland | 44102-3602 | 8/19/04 | |
| James | | Bonner | 3201 W 58th St | Cleveland | 44102-3607 | 8/20/04 | |
| Linas | | Klimavicius | 2075 W 98th St | Cleveland | 44102-3650 | 8/19/04 | |
| Deandre | | Smith | 2087 W 98th St | Cleveland | 44102-3653 | 8/19/04 | |
| Franklin | R | Nolan | 7006 Detroit Ave | Cleveland | 44102-3656 | 8/19/04 | |
| James | W | Robinson | 2104 W 93rd St | Cleveland | 44102-3704 | 8/20/04 | |
| Francisca | A | Robinson | 2104 W 93rd St | Cleveland | 44102-3704 | 8/20/04 | |
| Amy | | Dingess | 2118 W 93rd St | Cleveland | 44102-3704 | 8/19/04 | |
| Adrian | | Goins | 2126 W 96th St | Cleveland | 44102-3708 | 8/20/04 | |
| Tiffany | S | Davis | 9711 Lander Ave | Cleveland | 44102-3725 | 8/19/04 | |
| Kevin | | O'Neal | 2130 W 95th St | Cleveland | 44102-3730 | 8/19/04 | |
| Michelle | M | McDowell | 2010 W 95th St Apt 6 | Cleveland | 44102-3753 | 8/19/04 | |
| Yasom | N | Abushale | 2170 W 98th St | Cleveland | 44102-3758 | 8/20/04 | |
| Felicia | L | Murrell | 2016 W 89th St | Cleveland | 44102-3818 | 8/19/04 | |
| Jamie | | Robidoux | 8704 Platten Ave | Cleveland | 44102-3829 | 8/19/04 | |
| William | | Shannon | 6708 Wakefield Ave | Cleveland | 44102-3954 | 8/19/04 | |
| Paul | | Red | 7106 Madison | Cleveland | 44102-4044 | 8/19/04 | |
| Millagros | | Caban | 2178 W 80th St | Cleveland | 44102-4159 | 8/19/04 | |
| Herman | L | Lewis | 2042 W 73rd St #DN | Cleveland | 44102-4186 | 8/20/04 | |
| Retha | | Jordan | 7414 Colgate Ave | Cleveland | 44102-4229 | 8/19/04 | |
| Anthony | G | Quanda | 7466 Colgate Ave 3 | Cleveland | 44102-4229 | 8/19/04 | |
| Dollie | M | Wimmer | 7616 Lorain Ave | Cleveland | 44102-4250 | 8/19/04 | |
| Brandon | D | Bates | 2108 W 73rd St Apt 2 | Cleveland | 44102-4262 | 8/19/04 | |
| Danyell | N | Lockhart | 3256 W 98th St | Cleveland | 44102-4602 | 8/19/04 | |
| Kim | S | Fuley | 3431 W 98th St | Cleveland | 44102-4605 | 8/20/04 | |
| Tina | M | Adkins | 3236 W 99th St | Cleveland | 44102-4610 | 8/19/04 | |

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| Theodore | | Pickett | | 9712 Almiral Ave | Cleveland | 44102-4708 | 8/19/04 | |
| Margurita | | Johnson | | 3549 W 97th St | Cleveland | 44102-4728 | 8/20/04 | |
| Wannell | | Howze | | 3127 W 88th St | Cleveland | 44102-4801 | 8/20/04 | |
| Sherwin | | Scott | | 3197 W 90th St 2 | Cleveland | 44102-4805 | 8/19/04 | |
| Makel | | Johnson | | 3222 W 90th St | Cleveland | 44102-4808 | 8/19/04 | |
| Latoya | Q | James | | 3233 W 94th St | Cleveland | 44102-4815 | 8/19/04 | |
| Jeffrey | A | Scamardo | | 3481 W 94th St | Cleveland | 44102-4841 | 8/19/04 | |
| Aia | R | Tisby | | 9006 Denison Ave | Cleveland | 44102-4847 | 8/19/04 | |
| Angel | | Mercardo | | 3255 W 86th St | Cleveland | 44102-4940 | 8/19/04 | |
| José | | Rodriguez | Jr | 3210 W 73rd St | Cleveland | 44102-5213 | 8/20/04 | |
| John | L | Prim | | 7101 Clark Ave | Cleveland | 44102-5224 | 8/20/04 | |
| Mirna | E | Melendez | | 3566 W 63rd St | Cleveland | 44102-5408 | 8/20/04 | |
| Jennifer | L | Shanblin | | 3391 W 60th St | Cleveland | 44102-5528 | 8/19/04 | |
| Sheryl | A | Nageotte | | 3478 W 63rd St | Cleveland | 44102-5559 | 8/19/04 | |
| José | | Colon | | 3124 W 58th St | Cleveland | 44102-5606 | 8/20/04 | |
| Bill | | Wilson | | 3154 W 61st St | Cleveland | 44102-5612 | 8/19/04 | |
| Pamela | S | Boggs | | 3461 W 58th St | Cleveland | 44102-5637 | 8/19/04 | |
| Rosa | E | Colon | | 3485 W 58th St | Cleveland | 44102-5642 | 8/19/04 | |
| Alberto | | Rodriguez | | 3351 W 59th Pl | Cleveland | 44102-5642 | 8/19/04 | |
| Jason | M | Hagan | | 3357 W 59th Pl | Cleveland | 44102-5642 | 8/19/04 | |
| Dina | | Yonko | | 3370 W 59th Pl | Cleveland | 44102-5643 | 8/19/04 | |
| Jeffrey | | Braun | | 3275 W 58th St | Cleveland | 44102-5657 | 8/19/04 | |
| Sylvette | M | Gonzalez | | 3501 W 59th St | Cleveland | 44102-5667 | 8/19/04 | |
| Craig | A | Pearce | | 3115 W 58th St UP | Cleveland | 44102-5671 | 8/19/04 | |
| Reginald | M | Whitson | | 3288 W 58th St 212 | Cleveland | 44102-5677 | 8/19/04 | |
| Nancy | C | Melcher | | 3401 W 56th St | Cleveland | 44102-5719 | 8/19/04 | |
| Raneshia | L | Johnson | | 3443 W 56th St | Cleveland | 44102-5719 | 8/19/04 | |
| Jonathan | O | Snyder | | 3406 W 56th St | Cleveland | 44102-5720 | 8/19/04 | |
| Natalie | | Gomez | | 3462 W 54th St | Cleveland | 44102-5743 | 8/20/04 | |
| Erica | E | Rose | | 3256 W 56th St UP | Cleveland | 44102-5747 | 8/19/04 | |
| Cas | | Heard | | 3231 W 54th St #2 | Cleveland | 44102-5758 | 8/19/04 | |
| Dean | M | Furcello | | 3199 W 58th St UP | Cleveland | 44102-5760 | 8/19/04 | |
| Manuel | D | Rodriguez | | 3287 W 56th St | Cleveland | 44102-5761 | 8/19/04 | |
| Rosa | K | Hill | | 3161 W 50th St | Cleveland | 44102-5835 | 8/19/04 | |
| Emily | A | Stewart | | 3201 W 52nd St | Cleveland | 44102-5881 | 8/19/04 | |
| Karen | S | Jones | | 3153 W 48th St | Cleveland | 44102-5931 | 8/19/04 | |
| Albert | C | Davis | Jr | 3286 W 48th St | Cleveland | 44102-5934 | 8/19/04 | |

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| Clifton | R | Johnson | 3206 W 46th St | Cleveland | 44102-5969 | 8/19/04 | |
| Marion | L | Marshall | 11580 Lake Ave | Cleveland | 44102-6108 | 8/19/04 | |
| Julia | A | Marshall | 11580 Lake Ave | Cleveland | 44102-6108 | 8/19/04 | |
| Daniel | I | Guido | 1456 W 85th St | Cleveland | 44102-6602 | 8/20/04 | |
| James | H | Lipscomb | 1188 Norwood Rd | Cleveland | 44103-1588 | 8/19/04 | |
| Zsanneiscia | C | Jirt | 1095 Addison Rd | Cleveland | 44103-1646 | 8/19/04 | |
| Jeff | | Hall | 1217 E 71st St 2 | Cleveland | 44103-1936 | 8/19/04 | |
| Percy | | Clark | 7610 Cornelia Ave | Cleveland | 44103-2014 | 8/19/04 | |
| Jennifer | A | Moore | 8014 Korman Ave | Cleveland | 44103-2138 | 8/19/04 | |
| Michael | W | Hochschild | 15757 Mandalay Ave DN | Cleveland | 44103-214 | 8/19/04 | |
| Donnell | F | Younger | 1033 E 79th St | Cleveland | 44103-2169 | 8/19/04 | |
| Henry | D | Booker | 8110 Decker Ave | Cleveland | 44103-2998 | 8/20/04 | |
| Edwin | M | Gu | 7810 Cedar Ave Apt 3 | Cleveland | 44104-2204 | 8/19/04 | |
| Diane | | Harris | 2478 E 83rd St #603 | Cleveland | 44104-2465 | 8/20/04 | |
| Terence | R | Grayner | 9619 Steinway Ave | Cleveland | 44104-3465 | 8/20/04 | |
| Arnell | W | Wright | 10506 Grandview Ave | Cleveland | 44104-3501 | 8/19/04 | |
| Arrance | E | Wright | 10506 Grandview Ave | Cleveland | 44104-3521 | 8/19/04 | |
| Keyanna | N | Burton | 10309 Hilda Ave | Cleveland | 44104-3538 | 8/19/04 | |
| Demetrius | | Vaden | 10309 Hilda Ave | Cleveland | 44104-3538 | 8/20/04 | |
| Sheryl | R | Cool | 10301 Shade Ave | Cleveland | 44104-3613 | 8/19/04 | |
| Dwayne | | Hudson | 10406 Buckeye Rd | Cleveland | 44104-3727 | 8/19/04 | |
| Gynthia | | Fantroy | 10310 Shaker Blvd | Cleveland | 44104-3778 | 8/19/04 | |
| Demetrius | J | Campbell | 9613 Heath Ave 1 | Cleveland | 44104-5515 | 8/19/04 | |
| Jason | A | Ertenger | 3667 E 57th St | Cleveland | 44105-1133 | 8/20/04 | |
| Melisa | D | Burress | 5608 Mound Ave | Cleveland | 44105-1168 | 8/19/04 | |
| Tameka | A | Mitchell | 3725 E 65th St | Cleveland | 44105-1254 | 8/20/04 | |
| Tommy | O | Hobbs | 3715 E 61st St Apt 3 | Cleveland | 44105-1266 | 8/20/04 | |
| Chad | | Richards | 3708 E 63rd St | Cleveland | 44105-1292 | 8/20/04 | |
| James | W | Robinson | 3688 E 63rd St Apt 2 | Cleveland | 44105-1297 | 8/19/04 | |
| Kenyn | S | Zaid | 6603 Union Ave | Cleveland | 44105-1321 | 8/19/04 | |
| Tequia | S | Duke | 7209 Union Ave | Cleveland | 44105-1451 | 8/19/04 | |
| Tabrea | Q | Roberson | 6518 Chambers Ave Apt 5 | Cleveland | 44105-1486 | 8/19/04 | |
| Michael | | Wright | 6518 Chambers Ave Apt 5 | Cleveland | 44105-1486 | 8/19/04 | |
| Michael | | Wright | 6518 Chambers Ave Apt 5 | Cleveland | 44105-1486 | 8/19/04 | |
| Airane | B | Kennedy | 3545 E 81st St | Cleveland | 44105-1525 | 8/20/04 | |
| Darnell | D | Taylor | 9901 Union Ave 3 | Cleveland | 44105-1759 | 8/20/04 | |
| Yalonda | | Moddy | 3534 E 108th St | Cleveland | 44105-1820 | 8/19/04 | |

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|----------|---|----------------|-----------------------|-----------|------------|---------|--|
| Kirk | L | Lones | 3556 E 118th St | Cleveland | 44105-1862 | 8/20/04 | |
| Patrice | N | Henderson | 3556 E 118th St | Cleveland | 44105-1862 | 8/20/04 | |
| Isabel | N | Abdur-Razzaque | 12310 Benham Ave | Cleveland | 44105-1912 | 8/20/04 | |
| James | D | Brown | 9510 Anderson Ave | Cleveland | 44105-2206 | 8/20/04 | |
| Lowanda | D | McMillan | 9602 Orlean Ave | Cleveland | 44105-2228 | 8/20/04 | |
| Marshall | G | Fairfax | 9420 Dunlap Ave | Cleveland | 44105-2331 | 8/19/04 | |
| Lawrance | | Pennymann | 3578 E 106th St | Cleveland | 44105-2418 | 8/20/04 | |
| Kim | T | Starks | 10512 Sandusky Ave UP | Cleveland | 44105-2439 | 8/19/04 | |
| James | H | Johnson | 3696 E 110th St | Cleveland | 44105-2468 | 8/19/04 | |
| Wanda | M | Blair | 3617 E 116th St | Cleveland | 44105-2511 | 8/20/04 | |
| Steve | | Smith | 3632 E 117th St | Cleveland | 44105-2517 | 8/20/04 | |
| Gerald | | Macklin | 3652 E 117th St | Cleveland | 44105-2523 | 8/20/04 | |
| Ernest | | Brooks | 11717 Farringdon Ave | Cleveland | 44105-2532 | 8/20/04 | |
| Kenneth | R | Benton | 11717 Farringdon Ave | Cleveland | 44105-2532 | 8/20/04 | |
| Monique | A | Simpson | 11718 Grave Ave | Cleveland | 44105-2577 | 8/20/04 | |
| Joshua | | Hopkins | 3607 E 117th St Apt 2 | Cleveland | 44105-2588 | 8/19/04 | |
| Vince | | Butler | 12718 Holborn Ave | Cleveland | 44105-2625 | 8/20/04 | |
| Anthony | D | Oden | 12401 Craven Ave | Cleveland | 44105-2647 | 8/20/04 | |
| Louis | A | Martich | 3847 E 50th St UP | Cleveland | 44105-3311 | 8/19/04 | |
| Mike | G | Brown | 3812 E 54th St | Cleveland | 44105-3350 | 8/20/04 | |
| Jessica | M | Bennett | 7424 Ottawa Rd | Cleveland | 44105-3823 | 8/19/04 | |
| Larry | J | Esleridge | 8415 Broadway Ave | Cleveland | 44105-3932 | 8/20/04 | |
| Claude | | Amburgey | 8415 Broadway Ave | Cleveland | 44105-3932 | 8/20/04 | |
| Lavell | A | Gaddis | 8415 Broadway Ave | Cleveland | 44105-3932 | 8/20/04 | |
| Jerome | P | Owens | 8415 Broadway Ave | Cleveland | 44105-3932 | 8/20/04 | |
| Teresa | D | Cartwright | 1835 Harvard Ave #314 | Cleveland | 44105-3938 | 8/19/04 | |
| Ronda | M | Thaxton | 7835 Harvard Ave | Cleveland | 44105-4007 | 8/20/04 | |
| Antoine | D | Williams | 9617 Elizabeth Ave | Cleveland | 44105-4012 | 8/20/04 | |
| Theresa | | Castleberry | 9806 Elizabeth Ave UP | Cleveland | 44105-4053 | 8/20/04 | |
| Gary | L | Dancy | 3899 E 97th St | Cleveland | 44105-4254 | 8/19/04 | |
| Terry | | Little | 10607 Nelson Ave | Cleveland | 44105-4320 | 8/20/04 | |
| Antonio | M | Lewis | 11505 Dove Ave UP | Cleveland | 44105-4552 | 8/20/04 | |
| Nafisah | A | Zahir | 4015 E 121st St | Cleveland | 44105-4610 | 8/19/04 | |
| Darryl | | Moore | 13510 Benwood Ave | Cleveland | 44105-4611 | 8/20/04 | |
| Carlisle | L | Robinson | 13601 Benwood Ave #3 | Cleveland | 44105-4635 | 8/19/04 | |
| Delbert | C | Moore | 13908 Durfee Ave | Cleveland | 44105-4738 | 8/20/04 | |
| James | P | Poor | 4080 E 127th St | Cleveland | | | |

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|-----------|---|----------|-----|----------------------|------------------|------------|---------|--|
| Sean | | Boyd | | 3937 E 53rd St | Newburgh Heights | 44105-4846 | 8/20/04 | |
| Devon | G | Island | | 4073 E 76th St | Cleveland | 44105-5057 | 8/19/04 | |
| Jeanette | M | Ciepanko | | 9205 Harvard Ave | Cleveland | 44105-5274 | 8/19/04 | |
| Henry | | Lewis | | 4125 E 130th St | Cleveland | 44105-5324 | 8/19/04 | |
| Sharmaine | M | Matthews | | 4110 E 123rd St DN | Cleveland | 44105-5413 | 8/20/04 | |
| Shala | | Tustone | | 13904 Miles Ave UP | Cleveland | 44105-5533 | 8/20/04 | |
| Tom | | Roberts | | 12604 Miles Ave J | Cleveland | 44105-5539 | 8/20/04 | |
| Terrence | | Rose | | 8215 Force Ave | Cleveland | 44105-5815 | 8/20/04 | |
| Jennifer | | Havran | | 8104 Maryland Ave DN | Cleveland | 44105-5938 | 8/19/04 | |
| Desmond | | Apples | | 11710 Robertson Ave | Cleveland | 44105-6223 | 8/19/04 | |
| Michael | T | Schade | | 4230 E 131st St | Cleveland | 44105-6350 | 8/19/04 | |
| Jodi | A | Love | | 7716 Bancroft Ave UP | Cleveland | 44105-6507 | 8/20/04 | |
| Dana | M | Smith | | 13695 S Parkway Dr | Garfield Heights | 44105-6837 | 8/19/04 | |
| Steven | O | Smith | | 4389 E 131st St UP | Garfield Heights | 44105-6945 | 8/19/04 | |
| Terese | M | Gregg | | 3907 E 71st | Cleveland | 44105-7310 | 8/19/04 | |
| Mario | | Phillips | Jr | 1425 E 83th St | Cleveland | 44106-1003 | 8/19/04 | |
| Paul | L | Finley | | 1397 E 93rd St | Cleveland | 44106-1005 | 8/19/04 | |
| Robert | | Ferguson | III | 1416 E 89th St | Cleveland | 44106-1026 | 8/19/04 | |
| Ken | D | Jackson | | 1360 E 90th St | Cleveland | 44106-1028 | 8/19/04 | |
| parisio | B | Ortiz | | 1361 E 91st St | Cleveland | 44106-1031 | 8/19/04 | |
| Adrian | A | Iyes | | 1482 E 106th St | Cleveland | 44106-1105 | 8/19/04 | |
| Terry | | Anthony | Jr | 1457 E 105th St | Cleveland | 44106-1137 | 8/19/04 | |
| Lenord | | Harris | | 1357 E 105th St | Cleveland | 44106-1231 | 8/19/04 | |
| Diana | | Wallace | | 10716 Lee Ave | Cleveland | 44106-1244 | 8/19/04 | |
| Debbie | | Foster | | 10915 Orville Ave | Cleveland | 44106-1244 | 8/19/04 | |
| Katy | | Foster | | 10915 Orville Ave | Cleveland | 44106-1256 | 8/19/04 | |
| Darlene | Y | Jones | | 10707 Lee Ave Apt 4 | Cleveland | 44106-1323 | 8/19/04 | |
| Tamiko | T | Farris | | 1323 E 114th St | Cleveland | 44106-1408 | 8/19/04 | |
| Tina | | Russell | | 1344 E 123rd St | Cleveland | 44106-1408 | 8/19/04 | |
| James | | Johnson | | 1364 E 123rd St | Cleveland | 44106-1408 | 8/19/04 | |
| James | | Spieler | | 1364 E 123rd St | Cleveland | 44106-1408 | 8/19/04 | |
| Jonathan | | Mutz | | 1321 Lakeview Rd | Cleveland | 44106-1427 | 8/19/04 | |
| Damon | L | Beal | | 1477 E 116th St | Cleveland | 44106-1451 | 8/19/04 | |
| Lashawn | J | Harris | | 1390 Lakeview Rd | Cleveland | 44106-1470 | 8/19/04 | |
| Deant | P | Booker | | 1379 E 120th St | Cleveland | 44106-1477 | 8/19/04 | |
| Deonte | P | Booker | | 1379 E 120th St | Cleveland | 44106-1477 | 8/19/04 | |
| Lontar | C | Brock | | 1379 E 120th St 4 | Cleveland | 44106-1477 | 8/19/04 | |

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|-----------|---|------------|--------------------------------|-------------------|------------|---------|--|
| Diane | V | Smoot | 11706 Beulah Ave | Cleveland | 44106-1480 | 8/19/04 | |
| Ronnie | | Dean | 1673 E 90th St | Cleveland | 44106-1504 | 8/19/04 | |
| Brent | A | Frige | 9001 Hough Ave | Cleveland | 44106-1506 | 8/19/04 | |
| Veronica | P | Mansion | 9231 Hough Ave 1 | Cleveland | 44106-1586 | 8/19/04 | |
| Wyeia | S | Walter | 9410 Hough Ave | Cleveland | 44106-1599 | 8/19/04 | |
| Andrew | L | Dunn | 11021 East Blvd | Cleveland | 44106-1703 | 8/19/04 | |
| Jason | A | Yoh | 1906 E 120th St | Cleveland | 44106-1979 | 8/19/04 | |
| Jimmy | P | Mason | 1905 E 89th St | Cleveland | 44106-2007 | 8/19/04 | |
| Gregory | | Hooper | 1905 E 89th St | Cleveland | 44106-2007 | 8/19/04 | |
| Alisha | D | Lindsey | 1905 E 89th St | Cleveland | 44106-2007 | 8/19/04 | |
| Aaron | E | Brown | 1814 E 85th St | Cleveland | 44106-2014 | 8/19/04 | |
| Chavaugan | D | Copeland | 1819 E 86th St | Cleveland | 44106-2018 | 8/19/04 | |
| Joseph | D | James | 1859 E 86th St | Cleveland | 44106-2018 | 8/19/04 | |
| Demetrius | G | Johnson | 1831 E 87th St | Cleveland | 44106-2024 | 8/19/04 | |
| Ioy | A | Gibbs | 1840 E 87th St | Cleveland | 44106-2025 | 8/19/04 | |
| Charles | G | Brown | 1835 E 93rd St | Cleveland | 44106-2050 | 8/19/04 | |
| Ramon | D | Hanson | 1871 E 93rd St | Cleveland | 44106-2050 | 8/19/04 | |
| Regina | M | Sims | 1847 E 87th St | Cleveland | 44106-2091 | 8/19/04 | |
| Charles | | Warner | 9813 Cedar Ave | Cleveland | 44106-2114 | 8/19/04 | |
| Monique | L | Giroux | 2549 Kenilworth Rd Apt 2 | Cleveland Heights | 44106-2473 | 8/19/04 | |
| Malcom | S | Wighman | 2759 Hampshire Rd Apt 4 | Cleveland Heights | 44106-2580 | 8/19/04 | |
| Carly | C | Blatt | 2757 Euclid Heights Blvd Apt 1 | Cleveland Heights | 44106-2839 | 8/19/04 | |
| Michael | D | Brown | 9306 Cedar Ave | Cleveland | 44106-2928 | 8/19/04 | |
| Robert | T | Dickson | 2043 E 86th St | Cleveland | 44106-2963 | 8/19/04 | |
| Bryan | E | Linkous | 2284 Grandview Ave | Cleveland | 44106-3142 | 8/19/04 | |
| Nah | | Israel | 2096 Surrey Rd Apt 3 | Cleveland Heights | 44106-3261 | 8/19/04 | |
| Tony | V | Taylor | 2214 E 89th St | Cleveland | 44106-3402 | 8/19/04 | |
| Shayla | R | Norwood | 2219 E 101st St | Cleveland | 44106-3579 | 8/19/04 | |
| John | | Roberts | 1689 E 85th St | Cleveland | 44106-3707 | 8/19/04 | |
| Kernit | I | Abrams | 1607 E 86th St | Cleveland | 44106-3713 | 8/19/04 | |
| Bonnie | | Hall | 8615 Wade Park Ave | Cleveland | 44106-3738 | 8/19/04 | |
| Nick | J | Michrovicz | 11435 Juniper Rd #420 | Cleveland | 44106-3976 | 8/20/04 | |
| Sally | | Wilson | 1485 East Blvd | Cleveland | 44106-4012 | 8/19/04 | |
| Orlando | | Gaston | 1487 East Blvd | Cleveland | 44106-4012 | 8/19/04 | |
| Robert | L | Hardnet | 1675 Ansel Rd Apt 922 | Cleveland | 44106-4172 | 8/19/04 | |
| Laura | A | Flyn | 10711 Arthur Ave | Cleveland | 44106-4213 | 8/19/04 | |
| Johnnie | B | Johnston | 10719 Arthur Ave | Cleveland | 44106-4213 | 8/19/04 | |

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|------------|---|-------------|--------------------------|-----------|------------|---------|--|
| Laura | M | Lones | 10710 Arthur Ave | Cleveland | 44106-4214 | 8/19/04 | |
| Cassandra | M | Samms | 10801 Arthur Ave | Cleveland | 44106-4215 | 8/19/04 | |
| Matt | P | Wald | 1720 E 116th Pl Apt 11 | Cleveland | 44106-4330 | 8/19/04 | |
| Byron | A | Hitchcock | 1720 E 116th Pl | Cleveland | 44106-4331 | 8/19/04 | |
| Nicole | M | Moore | 8717 Kenmore Ave | Cleveland | 44106-4509 | 8/19/04 | |
| Tenika | I | Tucker | 8618 Meridian Ave | Cleveland | 44106-4515 | 8/19/04 | |
| Charles | | Slapak | 2190 Ambleside Dr F6036 | Cleveland | 44106-4633 | 8/19/04 | |
| Michelle | | Thomas | 9360 Amesbury Ave | Cleveland | 44106-4801 | 8/19/04 | |
| Cleus | L | Williams | 1779 E 89th St Apt 3 | Cleveland | 44106-4808 | 8/19/04 | |
| William | D | Philpott | 1838 E 90th St | Cleveland | 44106-4852 | 8/19/04 | |
| Traice | M | Morris | 1832 E 90th St | Cleveland | 44106-4853 | 8/19/04 | |
| Emma | | Williams | 1832 E 90th St | Cleveland | 44106-5301 | 8/19/04 | |
| Michael | J | McCall | 1458 E 115th St | Cleveland | 44106-5302 | 8/19/04 | |
| Latonya | N | Spencer | 1458 E 115th St Apt 5 | Cleveland | 44106-5961 | 8/19/04 | |
| Erin | M | Shukart | 1964 E 126th St | Cleveland | 44106-5961 | 8/19/04 | |
| Angela | S | Ricotta | 253 Beech St | Berea | 44107-1209 | 8/19/04 | |
| Raymond | | Curry | 16101 Lake Ave | Lakewood | 44107-1247 | 8/19/04 | |
| Constance | T | Ludrosky | 12505 Edwater Dr Apt 106 | Lakewood | 44107-1632 | 8/19/04 | |
| Clarissa | L | Perkins | 11820 Edwater Dr Apt 510 | Lakewood | 44107-1793 | 8/19/04 | |
| Ann | G | Heidenreich | 11732 Lake Ave Apt 201 | Lakewood | 44107-2053 | 8/20/04 | |
| Eva | A | Hutter | 1211 Granger Ave | Lakewood | 44107-2218 | 8/20/04 | |
| Nicole | S | McVay | 1332 Webb Rd | Lakewood | 44107-2227 | 8/19/04 | |
| Fehmi | S | Daoud | 14703 Clifton Blvd | Lakewood | 44107-2521 | 8/20/04 | |
| Douglas | | Eisenbrown | 1317 Belle Ave | Lakewood | 44107-2679 | 8/20/04 | |
| Mark | D | Perdue | 1352 Lakewood Ave 1 | Lakewood | 44107-2848 | 8/20/04 | |
| Katie | M | Greene | 12816 Detroit Ave #1 | Lakewood | 44107-2854 | 8/19/04 | |
| Tabitha | A | Prinzano | 11840 S Lane Dr Apt 7 | Lakewood | 44107-2927 | 8/20/04 | |
| Eric | D | Davis | 12410 Detroit Ave #2 | Lakewood | 44107-3013 | 8/19/04 | |
| Jeffrey | T | Harris | 1340 W Clifton Blvd 00 | Lakewood | 44107-3364 | 8/20/04 | |
| Hallie | E | Page | 1441 Rockway Ave | Lakewood | 44107-3823 | 8/20/04 | |
| Jean | M | Pandoli | 1530 Mars Ave | Lakewood | 44107-4547 | 8/19/04 | |
| Jessica | L | Berry | 14212 Cedarwood Ave UP | Lakewood | 44107-4753 | 8/20/04 | |
| Angela | D | Raycheck | 1415 Wyandotte Ave 10 | Lakewood | 44107-5015 | 8/19/04 | |
| Bianca | | Rivera | 1446 Ridgewood Ave | Lakewood | 44107-5298 | 8/20/04 | |
| Antoinette | L | Battiste | 2104 Lark St #A | Lakewood | 44107-5748 | 8/20/04 | |
| Verdell | S | Benfield | 2014 Morrison Ave Apt 3 | Lakewood | 44107-5748 | 8/20/04 | |
| Dana | | Sisk | 2020 Warren Rd | Lakewood | 44107-5841 | 8/19/04 | |

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|------------|---|------------|------------------------|-----------|------------|---------|--|
| Jeffrey | E | Cechura | 2040 Richland Ave | Lakewood | 44107-6002 | 8/20/04 | |
| Dominique | M | Reminick | 2011 Buns Rd 16 | Lakewood | 44107-6101 | 8/20/04 | |
| Tiano | A | Dozier | 1631 Newman Ave Apt 1 | Lakewood | 44107-7202 | 8/20/04 | |
| Ioshenna | | Johnson | 625 E 99th St | Cleveland | 44108-1213 | 8/20/04 | |
| Gregory | E | Simmons | 681 E 99th St | Cleveland | 44108-1213 | 8/20/04 | |
| Khaniedra | E | Ferguson | 723 E 99th St | Cleveland | 44108-1215 | 8/20/04 | |
| Mike | A | Johnson | 1332 W 93rd St | Cleveland | 44108-1226 | 8/20/04 | |
| Ioshua | M | Lynch | 710 E 91st St | Cleveland | 44108-1235 | 8/19/04 | |
| Darrell | M | Means | 762 E 92nd St | Cleveland | 44108-1239 | 8/19/04 | |
| Marvin | | | 619 E 94th St | Cleveland | 44108-1244 | 8/20/04 | |
| Wyndell | J | Tuistone | 688 E 96th St | Cleveland | 44108-1265 | 8/20/04 | |
| Angela | D | Jordan | 9005 Stewart Ave Apt 1 | Cleveland | 44108-1295 | 8/19/04 | |
| Quinchette | L | Wade | 10521 Glenville Ave UP | Cleveland | 44108-1315 | 8/20/04 | |
| Lucretina | D | McCalister | 668 E 101st St | Cleveland | 44108-1323 | 8/20/04 | |
| Rasheem | K | James | 672 E 101st St | Cleveland | 44108-1323 | 8/20/04 | |
| Daynion | J | Smith | 692 E 101st St | Cleveland | 44108-1323 | 8/20/04 | |
| Suyin | A | Foster | 692 E 101st St | Cleveland | 44108-1323 | 8/20/04 | |
| Daimonta | P | Washington | 648 E 102nd St | Cleveland | 44108-1327 | 8/19/04 | |
| Ariel | J | Wynn | 10320 Barrett Ave | Cleveland | 44108-1362 | 8/20/04 | |
| Michael | | Wilson | 586 E 105th St Apt 4 | Cleveland | 44108-1363 | 8/19/04 | |
| Mike | | Dawson | 569 E 102nd St | Cleveland | 44108-1370 | 8/19/04 | |
| Michael | | Dawson | 569 E 102nd St | Cleveland | 44108-1370 | 8/20/04 | |
| Terry | L | Hall | 593 E 101st St | Cleveland | 44108-1372 | 8/19/04 | |
| Tryone | L | Barboza | 634 E 102nd St | Cleveland | 44108-1384 | 8/19/04 | |
| Lamar | J | Edwards | 643 E 101st St | Cleveland | 44108-1384 | 8/20/04 | |
| Mario | J | Edwards | 643 E 101st St Apt 1 | Cleveland | 44108-1384 | 8/19/04 | |
| Mario | D | Cole | 643 E 101st St Apt 1 | Cleveland | 44108-1384 | 8/20/04 | |
| Gabrielle | M | Carter | 527 E 110th St | Cleveland | 44108-1402 | 8/19/04 | |
| Deidre | M | Conley | 556 E 110th UP | Cleveland | 44108-1403 | 8/19/04 | |
| Eva | B | Harris | 576 E 110th St | Cleveland | 44108-1403 | 8/19/04 | |
| Derrick | B | Dunnican | 527 E 117th St | Cleveland | 44108-1417 | 8/19/04 | |
| Monic | C | Jones | 425 E 114th St | Cleveland | 44108-1422 | 8/19/04 | |
| Paul | A | Nesbitt | 11202 Sellers Ave | Cleveland | 44108-1426 | 8/19/04 | |
| L.C. | | Bass | 541 E 108th St | Cleveland | 44108-1435 | 8/19/04 | |
| Taria | S | Thompson | 430 E 114th St UP | Cleveland | 44108-1470 | 8/19/04 | |
| Tony | P | Johnson | 561 E 114th St | Cleveland | 44108-1473 | 8/19/04 | |
| George | | Hunter | 468 E 117th St | Cleveland | 44108-1479 | 8/19/04 | |

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|-----------|-------|----------|---------------------|-----------|------------|---------|--|
| Nichelle | V | Shelton | 565 E 117th St | Cleveland | 44108-1481 | 8/19/04 | |
| Marcharie | O | Smith | 597 E 107th St | Cleveland | 44108-1489 | 8/19/04 | |
| Tamara | L | Hughes | 597 E 107th St | Cleveland | 44108-1489 | 8/19/04 | |
| Allen | P | Smith | 11708 Ablewhite Ave | Cleveland | 44108-1507 | 8/19/04 | |
| Trent | A | Gainer | 11607 Shadeland Ave | Cleveland | 44108-1546 | 8/19/04 | |
| David | A | Williams | 12012 Shadeland Ave | Cleveland | 44108-1554 | 8/19/04 | |
| Dequaris | M | Dowdell | 336 Eddy Rd Apt 9 | Cleveland | 44108-1638 | 8/19/04 | |
| Jonathan | J | Carter | 353 E 123rd St UP | Cleveland | 44108-1701 | 8/19/04 | |
| Janison | D | Jones | 363 E 123rd St | Cleveland | 44108-1701 | 8/19/04 | |
| Michael | J | Durroh | 351 E 124th St | Cleveland | 44108-1705 | 8/19/04 | |
| Tony | Q | Harden | 12424 Iowa Ave | Cleveland | 44108-1721 | 8/20/04 | |
| Pamela | Hines | | 12504 Locke Ave | Cleveland | 44108-1735 | 8/19/04 | |
| Denyia | R | Gordon | 12613 Locke Ave | Cleveland | 44108-1736 | 8/19/04 | |
| Tonya | | Pruitt | 430 Arbor Rd | Cleveland | 44108-1759 | 8/19/04 | |
| Steven | | Toby | 430 Arbor Rd | Cleveland | 44108-1759 | 8/19/04 | |
| Anita | | Pruitt | 430 Arbor Rd | Cleveland | 44108-1771 | 8/19/04 | |
| Rayshaw | O | Watson | 480 Cleveland Rd | Cleveland | 44108-1772 | 8/19/04 | |
| Floyd | J | Smith | 444 Cleveland Rd | Cleveland | 44108-1827 | 8/19/04 | |
| Tomiko | D | Tanke | 12504 Lancelot Ave | Cleveland | 44108-1829 | 8/19/04 | |
| Tamara | L | Ricker | 12602 Lancelot Ave | Cleveland | 44108-1832 | 8/19/04 | |
| Shayna | L | Willis | 12525 Vashit Ave | Cleveland | 44108-2025 | 8/20/04 | |
| Eric | I | Stanley | 13008 Austin Ave | Cleveland | 44108-2049 | 8/19/04 | |
| Victoria | E | Schmitt | 12714 Shaw Ave | Cleveland | 44108-2237 | 8/20/04 | |
| John | A | Denison | 771 E 102nd St | Cleveland | 44108-2242 | 8/20/04 | |
| herman | | Ciers | 652 E 106th St | Cleveland | 44108-2308 | 8/19/04 | |
| David | | Kennedy | 1234 Eddy Rd 1 | Cleveland | 44108-2315 | 8/19/04 | |
| King | G | Lawson | 941 Thornhill Dr | Cleveland | 44108-2319 | 8/19/04 | |
| Gregory | V | Yates | 654 E 115th St | Cleveland | 44108-2347 | 8/19/04 | |
| Shawn | S | Jackson | 589 E 120th St 4 | Cleveland | 44108-2348 | 8/19/04 | |
| Janie | | Stephens | 638 E 120th St UO | Cleveland | 44108-2360 | 8/19/04 | |
| Jason | | Delarge | 980 Eddy Rd | Cleveland | 44108-2361 | 8/19/04 | |
| Darnell | L | Harrison | 965 Eddy Rd UP | Cleveland | 44108-2363 | 8/19/04 | |
| Derek | G | Dorsey | 873 Thornhill Dr | Cleveland | 44108-2381 | 8/19/04 | |
| Yuset | L | Jones | 879 Eddy Rd | Cleveland | 44108-2427 | 8/20/04 | |
| Mary | K | Simmons | 12716 Woodside Ave | Cleveland | 44108-2432 | 8/20/04 | |
| Jerome | S | Brown | 640 E 125th St | Cleveland | 44108-2432 | 8/20/04 | |
| Chad | | | | | | | |

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| David | | Wheeler | | 615 E 128th St | Cleveland | 44108-2445 | 8/20/04 | |
| Robert | I | Clifford | | 625 E 128th St Apt 3 | Cleveland | 44108-2445 | 8/20/04 | |
| Mike | S | Burton | | 12643 Edmonon Ave | Cleveland | 44108-2515 | 8/19/04 | |
| Krystal | | Johnson | | 12622 Edmonon Ave | Cleveland | 44108-2516 | 8/19/04 | |
| Mario | D | Rogers | | 12827 Woodside Ave | Cleveland | 44108-2532 | 8/20/04 | |
| Robert | E | Olekson | | 962 E 129th St | Cleveland | 44108-2540 | 8/20/04 | |
| Tony | B | Mitchel | | 12634 Irvington Ave | Cleveland | 44108-2563 | 8/20/04 | |
| Derrick | P | Mayweather | | 11415 Hopkins Ave | Cleveland | 44108-2629 | 8/20/04 | |
| Robert | | Gardard | | 11602 Hopkins Ave | Cleveland | 44108-2634 | 8/20/04 | |
| John | | Renfree | | 860 Lakeview Rd | Cleveland | 44108-2650 | 8/20/04 | |
| Steve | D | Pebbles | | 11208 Hopkins Ave | Cleveland | 44108-2675 | 8/20/04 | |
| Laura | | Garrett | | 810 Parkwood Dr | Cleveland | 44108-2700 | 8/20/04 | |
| Dow | M | Dial | | 10520 Bryant St | Cleveland | 44108-2704 | 8/19/04 | |
| Donna | R | Davis | | 10801 Garfield Ave Up | Cleveland | 44108-2733 | 8/20/04 | |
| Michael | L | Johnson | | 10602 Kimberley Ave | Cleveland | 44108-2740 | 8/20/04 | |
| Sade | E | Jackson | | 9012 Kempton Ave | Cleveland | 44108-2933 | 8/19/04 | |
| Robin | | Thomas | | 10201 Kempton Ave | Cleveland | 44108-2956 | 8/19/04 | |
| Marcus | | Wilson | | 10539 Earle Ave | Cleveland | 44108-3019 | 8/20/04 | |
| Shaun | | Madison | | 10562 Earle Ave 1 | Cleveland | 44108-3020 | 8/19/04 | |
| Dante | L | Richmond | | 11707 Fairport Ave | Cleveland | 44108-3113 | 8/20/04 | |
| Roxie | D | Black | | 12100 Ohlman Ave Apt 5 | Cleveland | 44108-3128 | 8/19/04 | |
| Rosella | | Dumas | | 11401 Ohlman Ave | Cleveland | 44108-3131 | 8/20/04 | |
| Michael | W | Larry | | 11617 Ohlman Ave | Cleveland | 44108-3135 | 8/19/04 | |
| Lemarcus | D | Robertson | | 11618 Ohlman Ave | Cleveland | 44108-3136 | 8/19/04 | |
| Martha | A | Dixon | | 11601 Tuscora Ave | Cleveland | 44108-3155 | 8/19/04 | |
| Antoine | C | Whisett | | 11606 Tuscora Ave | Cleveland | 44108-3156 | 8/19/04 | |
| Jaeron | D | Johnson | | 11805 Tuscora Ave | Cleveland | 44108-3159 | 8/20/04 | |
| Ezra | | Lever | Jr | 10200 Adams Rd | Cleveland | 44108-3213 | 8/19/04 | |
| Julie | S | Johnson | | 9304 Adams Ave | Cleveland | 44108-3221 | 8/20/04 | |
| Ann | M | Edwards | | 9601 Adams Ave | Cleveland | 44108-3226 | 8/20/04 | |
| Shaunta | | Curt | | 9708 Adams Ave | Cleveland | 44108-3229 | 8/20/04 | |
| Timothy | E | Williams | | 1249 E 89th St Apt 1 | Cleveland | 44108-3361 | 8/20/04 | |
| Ronnie | L | Hill | Jr | 10010 Ostend Ave | Cleveland | 44108-3404 | 8/20/04 | |
| Andre | | Green | | 10002 Somerset Ave #12 | Cleveland | 44108-3416 | 8/20/04 | |
| Eric | | Canon | | 10223 Somerset Ave DN | Cleveland | 44108-3419 | 8/20/04 | |
| Noah | | Bloch | | 10409 Somerset Ave | Cleveland | 44108-3423 | 8/20/04 | |
| Sharaud | | Franks | | 9822 North Blvd | Cleveland | 44108-3428 | 8/19/04 | |

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|------------|---|-----------|------------------------|-----------|------------|---------|--|
| Charisse | C | Charles | 10235 South Blvd #N-11 | Cleveland | 44108-3447 | 8/19/04 | |
| Tim | L | Lindsay | 1273 E 100th St | Cleveland | 44108-3502 | 8/19/04 | |
| Jacqueline | D | Manley | 1245 E 102nd St DN | Cleveland | 44108-3506 | 8/19/04 | |
| Aaron | | Clark | 10729 Hathaway Ave | Cleveland | 44108-3515 | 8/19/04 | |
| Antwaun | | Jones | 10702 Olivet Ave | Cleveland | 44108-3526 | 8/19/04 | |
| Roy | I | Johnson | 1236 E 105th St | Cleveland | 44108-3568 | 8/19/04 | |
| Wilbro | B | Hamilton | 1265 Parkwood Dr | Cleveland | 44108-3616 | 8/19/04 | |
| Meggie | R | Davis | 10921 Grantwood Ave | Cleveland | 44108-3626 | 8/19/04 | |
| Joanna | L | Berry | 10916 Grantwood Ave | Cleveland | 44108-3627 | 8/19/04 | |
| Brandon | C | Murray | 10936 Grantwood Ave | Cleveland | 44108-3627 | 8/19/04 | |
| Willie | A | Gardner | 10933 Hampden Ave | Cleveland | 44108-3636 | 8/19/04 | |
| Marissa | | King | 10800 Tacoma Ave | Cleveland | 44108-3644 | 8/19/04 | |
| Veneccia | T | Brustier | 10905 Pasadena Ave | Cleveland | 44108-3665 | 8/19/04 | |
| Timothy | | Hill | 11123 ADA Ave | Cleveland | 44108-3716 | 8/19/04 | |
| Tia | | Shone | 11127 ADA Ave | Cleveland | 44108-3716 | 8/19/04 | |
| Eddie | J | Lewis | 11110 ADA Ave | Cleveland | 44108-3717 | 8/19/04 | |
| Erwin | | Hayes | 1107 E 111th St | Cleveland | 44108-3728 | 8/19/04 | |
| Daniel | J | Woods | 1113 E 111th St | Cleveland | 44108-3728 | 8/19/04 | |
| Brian | W | Vaughn | 1255 E 112th St | Cleveland | 44108-3735 | 8/19/04 | |
| Brian | | Vaughn | 1255 E 112th St | Cleveland | 44108-3735 | 8/19/04 | |
| Brian | | Vaughn | 1255 E 112th St | Cleveland | 44108-3735 | 8/19/04 | |
| Aaron | J | Scriven | 1258 E 112th St #40 | Cleveland | 44108-3747 | 8/19/04 | |
| Edward | L | Hood | 1250 E 114th St | Cleveland | 44108-3767 | 8/19/04 | |
| Jermaine | | Stone | 1025 Linn Dr Apt 5 | Cleveland | 44108-3864 | 8/19/04 | |
| Aaron | | Weems | 1084 E 123rd St | Cleveland | 44108-3865 | 8/19/04 | |
| India | J | George | 12337 Tuscora Ave | Cleveland | 44108-3900 | 8/19/04 | |
| Jose | | Jackson | 1046 Lakeview Rd | Cleveland | 44108-3900 | 8/19/04 | |
| Terlymm | | Norman | 1243 E 123rd St 6 | Cleveland | 44108-4001 | 8/20/04 | |
| Andrew | W | Price | 12009 Osceola Ave | Cleveland | 44108-4025 | 8/19/04 | |
| Rogar | L | Simmons | 12106 Phillips Ave | Cleveland | 44108-4040 | 8/19/04 | |
| Robert | | Bates | 1139 Lakeview Rd | Cleveland | 44108-4053 | 8/19/04 | |
| Tracy | L | Ohara | 1231 E 124th St Apt 2 | Cleveland | 44108-4081 | 8/19/04 | |
| Tanisha | N | Davis | 660 E 99th St Apt 2 | Cleveland | 44108-4105 | 8/20/04 | |
| Crystal | M | Wakefield | 797 E 90th St | Cleveland | 44108-4127 | 8/20/04 | |
| Charles | M | Thornton | 613 E 120th St | Cleveland | 44108-4203 | 8/19/04 | |
| Mario | J | Benson | 625 E 117th St | Cleveland | 44108-4204 | 8/19/04 | |

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| Melissa | L | Carte | | 3152 W 41st St | Cleveland | 44109-1274 | 8/19/04 | |
| Melvin | | Martinez | | 1643 Holmden Ave | Cleveland | 44109-1724 | 8/19/04 | |
| Meleva | | Carr | | 3121 Woodridge Ave | Cleveland | 44109-2175 | 8/19/04 | |
| Clifton | C | Mosby | | 2711 Riverside Ave | Cleveland | 44109-2321 | 8/19/04 | |
| Ronald | | Crabbe | | 4406 Denison Ave | Cleveland | 44109-2609 | 8/19/04 | |
| Randall | A | Harron | | 3512 Hentize Ave | Cleveland | 44109-3242 | 8/19/04 | |
| Gilbert | | Henderson | | 4239 W 24th St Rear | Cleveland | 44109-3301 | 8/19/04 | |
| Gilbert | R | Henderson | | 4239 W 24th St Rear | Cleveland | 44109-3301 | 8/19/04 | |
| Yvonne | | Scott | | 16700 Lake Shore Blvd | Cleveland | 44110-1071 | 8/19/04 | |
| Cathy | L | Dew | | 15448 Lake Shore Blvd | Cleveland | 44110-1121 | 8/19/04 | |
| Robert | | McQueen | | 16001 Euclid Beach Blvd Apt 12 | Cleveland | 44110-1127 | 8/19/04 | |
| Clark | S | Bryson | | 123 E 156th St | Cleveland | 44110-1181 | 8/19/04 | |
| Robert | | Lewis | | 125 E 156th St | Cleveland | 44110-1182 | 8/19/04 | |
| Robert | F | Wright | | 285 E 150th St | Cleveland | 44110-1210 | 8/19/04 | |
| Don | | Caldwell | | 15612 Groveswood Ave | Cleveland | 44110-1404 | 8/19/04 | |
| April | | Clark | | 1240 E 170th St | Cleveland | 44110-1541 | 8/20/04 | |
| Yvonne | | Clark | | 1240 E 170th St | Cleveland | 44110-1541 | 8/20/04 | |
| Eric | A | Payne | | 1256 E 170th St | Cleveland | 44110-1572 | 8/19/04 | |
| Rochelle | | Day | | 446 E 157th St | Cleveland | 44110-1648 | 8/19/04 | |
| Clarence | | Ladson | Sr | 13823 Lake Shore Blvd | Cleveland | 44110-1923 | 8/19/04 | |
| Jennaveve | | Madison | | 13906 Lake Shore Blvd | Cleveland | 44110-1931 | 8/19/04 | |
| Maurice | I | Davis | | 13304 Eaglesmere Ave | Cleveland | 44110-2138 | 8/19/04 | |
| Harold | I | Hammer | | 13585 Earlwood Rd | Cleveland | 44110-2222 | 8/19/04 | |
| Contha | A | Rider-Sugg | | 775 E 152nd St | Cleveland | 44110-2304 | 8/19/04 | |
| Mark | K | Sheline | | 775 E 152nd St S-10 | Cleveland | 44110-2304 | 8/19/04 | |
| Ernest | | Smith | | 17041 Saint Clair Ave | Cleveland | 44110-2528 | 8/19/04 | |
| Arabis | | Fitzgerald | | 19230 Nottingham Rd | Cleveland | 44110-2724 | 8/19/04 | |
| Charisse | L | Berry | | 16024 Saint Clair Ave | Cleveland | 44110-3027 | 8/19/04 | |
| Lamar | | Williams | | 786 London Rd 2 | Cleveland | 44110-3112 | 8/19/04 | |
| Michael | | Wilmore | | 1014 Ivanhoe Rd #2 | Cleveland | 44110-3207 | 8/19/04 | |
| Michael | | Wilmore | | 1014 Ivanhoe Rd #2 | Cleveland | 44110-3207 | 8/19/04 | |
| Roxanne | Y | Tewksbury | | 15630 Halliday Ave | Cleveland | 44110-3239 | 8/19/04 | |
| Damian | | Taylor | | 13623 Glenside Rd | Cleveland | 44110-3523 | 8/19/04 | |
| Alvin | L | Martin | | 13654 Saint Clair Ave | Cleveland | 44110-3547 | 8/19/04 | |
| Albert | M | Brown | | 904 E 146th St | Cleveland | 44110-3704 | 8/19/04 | |
| Alonzo | | Pord | | 827 E 147th St | Cleveland | 44110-3721 | 8/19/04 | |
| Anthony | | Harris | | 1637 Ansel Rd | Cleveland | 44110-4104 | 8/19/04 | |

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|-----------|---|------------|--------------------------|----------------|------------|---------|--|
| Meilyn | J | Smith | 10418 Almira Ave | Cleveland | 44111-1209 | 8/19/04 | |
| Ricky | | Wilkinson | 10212 Loreta Ave | Cleveland | 44111-1260 | 8/19/04 | |
| Gabriel | O | Linton | 14424 Birchwood Ave | Cleveland | 44111-1312 | 8/19/04 | |
| Michelle | L | Vaught | 3317 W 119th St | Cleveland | 44111-1760 | 8/19/04 | |
| Nahshon | S | Hamilton | 3081 W 105th St | Cleveland | 44111-1843 | 8/19/04 | |
| Ruben | J | Rodriguez | 3419 W 135th St | Cleveland | 44111-2405 | 8/19/04 | |
| Lanise | M | Penn | 3284 W 129th St | Cleveland | 44111-2501 | 8/19/04 | |
| Lara | D | Wells | 12123 Trickett Rd UTP | Cleveland | 44111-2549 | 8/19/04 | |
| Beatrice | R | Bennett | 10229 Bernard Ave | Cleveland | 44111-2802 | 8/19/04 | |
| Derek | | Smith | 10909 Joan Ave | Cleveland | 44111-2813 | 8/19/04 | |
| Kurt | P | Neubauer | 3275 W 110th St | Cleveland | 44111-2825 | 8/19/04 | |
| Art | | Knight | 3865 W 118th St | Cleveland | 44111-3007 | 8/19/04 | |
| Roberta | | Allen | 3625 W 147th St Apt 307 | Cleveland | 44111-3182 | 8/19/04 | |
| Kathryn | | Calliens | 3459 W 117th St | Cleveland | 44111-3520 | 8/19/04 | |
| Maria | | Hernandez | 3484 W 120th St | Cleveland | 44111-3536 | 8/19/04 | |
| David | A | Smith | 12027 Lorain Ave | Cleveland | 44111-3568 | 8/19/04 | |
| Sylvester | | Harris | 11316 Headley Ave UTP | Cleveland | 44111-3630 | 8/19/04 | |
| Rhonda | | Ferguson | 3487 W 100th St | Cleveland | 44111-3841 | 8/19/04 | |
| Chris | | Keffer | 3515 W 105th St | Cleveland | 44111-3858 | 8/19/04 | |
| Noah | K | Monroe | 3500 W 125th St | Cleveland | 44111-3859 | 8/19/04 | |
| Jacob | L | Evand | 3673 West Blvd | Cleveland | 44111-3859 | 8/19/04 | |
| Carmen | | Savirino | 3579 W 105th St | Cleveland | 44111-3879 | 8/19/04 | |
| Sammuel | | Santiago | 12205 Brighton Ave | Cleveland | 44111-4639 | 8/19/04 | |
| Sonia | M | Gonzalez | 11819 Brighton Ave | Cleveland | 44111-4639 | 8/19/04 | |
| James | P | Muniak | 11301 Saint Mark Ave | Cleveland | 44111-4761 | 8/19/04 | |
| George | J | Rich | 3865 W 116th St | Cleveland | 44111-5214 | 8/19/04 | |
| Deangelo | E | Thomas | 16321 Lorain Ave Apt 409 | Cleveland | 44111-5548 | 8/19/04 | |
| Muhammah | | Hafiz | 3634 Bosworth Rd | Cleveland | 44111-6004 | 8/19/04 | |
| Henry | R | Johnson | 3640 Bosworth Rd 24 | Cleveland | 44111-6004 | 8/19/04 | |
| Julio | E | Cordero | 3670 Bosworth Rd | Cleveland | 44111-6011 | 8/19/04 | |
| Phillip | A | Baite | 3670 Bosworth Rd | Cleveland | 44111-6013 | 8/19/04 | |
| Ashlee | C | Earmon | 18140 Euclid Ave | Cleveland | 44112-1089 | 8/19/04 | |
| Kirby | M | Wilcox | 1855 Cliffview Rd | Cleveland | 44112-1114 | 8/19/04 | |
| Ioshua | W | Huddleston | 1881 Noble Rd Apt 1 | East Cleveland | 44112-1664 | 8/19/04 | |
| Victoria | T | Lewis | 15600 Terrace Rd Apt 311 | East Cleveland | 44112-2047 | 8/19/04 | |
| Noelia | | Velazquez | 15600 Terrace Rd Apt 702 | East Cleveland | 44112-2049 | 8/19/04 | |
| Dunc | G | Shepherd | 15632 Euclid Ave | East Cleveland | 44112-2065 | 8/19/04 | |

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|-------------|---|------------|-------------------------------|----------------|------------|---------|--|
| Bernard | | Wilson | 15632 Euclid Ave | East Cleveland | 44112-2065 | 8/19/04 | |
| Denita | | Johnson | 1710 Lakewood Ave | East Cleveland | 44112-2123 | 8/19/04 | |
| Calvin | | Richardson | 1710 Lakewood Ave | East Cleveland | 44112-2133 | 8/19/04 | |
| Vincent | A | Heishell | 15999 Nelamere Rd | East Cleveland | 44112-2209 | 8/19/04 | |
| Talisha | C | Hall | 1284 E 133rd St UP | East Cleveland | 44112-2402 | 8/19/04 | |
| Janet | P | Roberts | 1370 E 134th St | East Cleveland | 44112-2453 | 8/19/04 | |
| Rico | | Sanchez | 1352 E 143rd St | East Cleveland | 44112-2540 | 8/19/04 | |
| Mark | M | Taylor | 1315 Coit Ave | East Cleveland | 44112-2653 | 8/19/04 | |
| Sharon | | Miner | 1335 Elwood Rd | East Cleveland | 44112-2701 | 8/19/04 | |
| John | L | Billar | 1770 Shaw Ave | East Cleveland | 44112-2813 | 8/19/04 | |
| Adolfo | X | Llanor | 1849 Taylor Rd | East Cleveland | 44112-2846 | 8/19/04 | |
| Phoe | C | Mason | 1724 Taylor Rd | East Cleveland | 44112-2888 | 8/19/04 | |
| Ternie | A | Jackson | 1565 W 29th St 4 | Cleveland | 44112-2906 | 8/19/04 | |
| Mary | | Johnson | 13507 5th Ave | East Cleveland | 44112-3105 | 8/19/04 | |
| Daniel | | Whitfield | 14600 Euclid Ave | East Cleveland | 44112-3451 | 8/19/04 | |
| Keith | | Fleming | 1885 Windemere St | East Cleveland | 44112-3903 | 8/19/04 | |
| Jason | | Dixon | 1889 Windemere St | East Cleveland | 44112-3903 | 8/19/04 | |
| Jamille | | West | 1810 Beersford Rd Apt 2 | East Cleveland | 44112-3994 | 8/19/04 | |
| Kathleen | A | Durigan | 12808 Phillips Ave | East Cleveland | 44112-4112 | 8/19/04 | |
| Tashara | M | Barkley | 1204 Melbourne Rd | East Cleveland | 44112-4137 | 8/19/04 | |
| Charles | C | Collins | 1988 Hayden Ave | East Cleveland | 44112-4139 | 8/20/04 | |
| Larry | | Harris | 1175 Rozelle Ave | East Cleveland | 44112-4141 | 8/19/04 | |
| Lakeshea | R | Thomas | 1188 Rozelle Ave | East Cleveland | 44112-4142 | 8/19/04 | |
| Joseph | | Smith | 1191 E 125th St | East Cleveland | 44112-4165 | 8/19/04 | |
| Alvin | | Head | 1724 Hartshorn Rd Apt 3 | East Cleveland | 44112-4262 | 8/19/04 | |
| Angels | C | Clark | 1716 Hartshorn Rd Apt 1 | East Cleveland | 44112-4264 | 8/19/04 | |
| Ronald | L | Reynolds | 1875 Forest Hills Blvd Apt C6 | East Cleveland | 44112-4351 | 8/19/04 | |
| David | L | Stanely | 13800 Terrace Rd | East Cleveland | 44112-4357 | 8/19/04 | |
| Tony | | Thomas | 1755 Carlyn Rd | East Cleveland | 44112-4403 | 8/19/04 | |
| Keith | | Black | 1726 E 133rd St Apt 203 | East Cleveland | 44112-4846 | 8/19/04 | |
| David | P | Kistler | 1278 W 9th St | Cleveland | 44113-1028 | 8/19/04 | |
| Christopher | C | Clinton | 1300 W 9th St | Cleveland | 44113-1031 | 8/19/04 | |
| Cedric | D | Beckett | 1300 W 9th St | Cleveland | 44113-1031 | 8/19/04 | |
| Lindsay | B | Lombardy | 1300 W 9th St | Cleveland | 44113-1031 | 8/19/04 | |
| Lonnie | | Issac | 1300 W 9th St | Cleveland | 44113-1031 | 8/19/04 | |
| Erik | S | Lodemeier | 1300 W 9th St | Cleveland | 44113-1031 | 8/19/04 | |
| David | W | Dulabon | 1300 W 9th St | Cleveland | 44113-1031 | 8/19/04 | |

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|------------|---------|------------|---------------------------|-----------|------------|---------|--|
| Ricky | | Bishop | 1299 W 25th St 301 | Cleveland | 44113-1101 | 8/19/04 | |
| Robert | A | Wilson | 2600 Loop Dr | Cleveland | 44113-1122 | 8/19/04 | |
| Mtume | Bell | | 1280 Spruce Ct | Cleveland | 44113-1136 | 8/19/04 | |
| Larry | Wellis | | 1295 Spruce Ct | Cleveland | 44113-1143 | 8/19/04 | |
| Teron | Kelly | | 2550 Loop Dr | Cleveland | 44113-1197 | 8/19/04 | |
| Antwon | I | Jackson | 976 W Saint Clair Ave | Cleveland | 44113-1211 | 8/19/04 | |
| Boris | J | Grimberg | 955 W Saint Clair Ave | Cleveland | 44113-1233 | 8/19/04 | |
| Frank | J | Valasiades | 955 W Saint Clair Ave | Cleveland | 44113-1233 | 8/19/04 | |
| Kristopher | L | Green | 955 W Saint Clair Ave | Cleveland | 44113-1247 | 8/19/04 | |
| Alfred | A | Moore | 710 W Saint Clair Ave | Cleveland | 44113-1804 | 8/19/04 | |
| Nasser | | Moiduddin | 740 W Superior Ave | Cleveland | 44113-2320 | 8/19/04 | |
| Robert | D | Hoff | 2249 Elm Ave | Cleveland | 44113-2320 | 8/19/04 | |
| Danail | Hriston | | 2249 Elm Ave | Cleveland | 44113-2434 | 8/19/04 | |
| Ronald | W | Davidson | 1854 Scranton Rd | Cleveland | 44113-2444 | 8/19/04 | |
| Saamil | K | Shah | 1500 Detroit Ave | Cleveland | 44113-2444 | 8/19/04 | |
| Samantha | L | Farlow | 1500 Detroit Ave | Cleveland | 44113-2444 | 8/19/04 | |
| Rebecca | | Feist | 1500 Detroit Ave | Cleveland | 44113-2444 | 8/19/04 | |
| Lisa | J | Molinaro | 1500 Detroit Ave | Cleveland | 44113-2603 | 8/19/04 | |
| Donte | | Thomas | 2648 Division Ave | Cleveland | 44113-2608 | 8/19/04 | |
| Kamille | T | Young | 2738 Division Ave | Cleveland | 44113-2615 | 8/19/04 | |
| Sharunda | M | Simesl | 2621 Division Ave | Cleveland | 44113-2619 | 8/19/04 | |
| Heather | E | Anderson | 2705 Division Ave Apt 570 | Cleveland | 44113-2640 | 8/19/04 | |
| Daniel | S | Walker | 2700 Washington Ave | Cleveland | 44113-2640 | 8/19/04 | |
| Michael | J | Key | 2700 Washington Ave | Cleveland | 44113-2659 | 8/19/04 | |
| Gregory | R | Gray | 2616 Division Ave Apt 462 | Cleveland | 44113-2667 | 8/19/04 | |
| Adam | J | Mitchell | 2558 Division Ave | Cleveland | 44113-2711 | 8/19/04 | |
| Vincent | C | Marconi | 2860 Detroit Ave | Cleveland | 44113-2733 | 8/19/04 | |
| Jeff | L | Palmer | 2849 Detroit Ave | Cleveland | 44113-3033 | 8/19/04 | |
| Jeffrey | | Barnes | 2515 Jay Ave | Cleveland | 44113-3104 | 8/19/04 | |
| Jennifer | | Marrano | 1512 W 25th St | Cleveland | 44113-3109 | 8/19/04 | |
| William | L | Sayle | 1745 W 25th St | Cleveland | 44113-3109 | 8/19/04 | |
| Deborah | A | Leonard | 1745 W 25th St | Cleveland | 44113-3109 | 8/19/04 | |
| Chuckie | S | Whetzel | 1745 W 25th St | Cleveland | 44113-3109 | 8/19/04 | |
| Rubin | J | Szerlip | 1745 W 25th St | Cleveland | 44113-3109 | 8/19/04 | |
| Raymond | | Alexander | 1745 W 25th St | Cleveland | 44113-3109 | 8/19/04 | |
| Level | T | Henderson | 1745 W 25th St | Cleveland | 44113-3109 | 8/19/04 | |
| Carolyn | E | Peoples | 1745 W 25th St | Cleveland | 44113-3109 | 8/19/04 | |

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|------------|---|------------|-----------------------|-----------|------------|---------|--|
| Jacqueline | | Diaz | 1745 W 25th St | Cleveland | 44113-3109 | 8/19/04 | |
| Willie | E | Williams | 1745 W 25th St | Cleveland | 44113-3109 | 8/19/04 | |
| Carlton | L | James | 1745 W 25th St | Cleveland | 44113-3109 | 8/19/04 | |
| Anna | M | Young | 1745 W 25th St 9015 | Cleveland | 44113-3109 | 8/19/04 | |
| Juan | R | Rivera | 1795 W 25th St | Cleveland | 44113-3112 | 8/19/04 | |
| George | | Johnson | 1795 W 25th St | Cleveland | 44113-3112 | 8/19/04 | |
| Tony | A | Bussey | 1795 W 25th St | Cleveland | 44113-3112 | 8/19/04 | |
| Kevin | N | Young | 1795 W 25th St | Cleveland | 44113-3112 | 8/19/04 | |
| Tito | | Cruz | 1795 W 25th St | Cleveland | 44113-3112 | 8/19/04 | |
| Malik | | Walyyudin | 1795 W 25th St | Cleveland | 44113-3112 | 8/19/04 | |
| John | | Waltham | 1795 W 25th St 1004 | Cleveland | 44113-3112 | 8/19/04 | |
| Mary | | Miles | 1795 W 25th St 1009 | Cleveland | 44113-3112 | 8/19/04 | |
| Gregory | | Reeves | 1795 W 25th St 1015 | Cleveland | 44113-3112 | 8/19/04 | |
| Angelia | | Woodard | 4115 Whitman Ave UP | Cleveland | 44113-3236 | 8/19/04 | |
| Timothy | E | Opus | 3926 Bridge Ave | Cleveland | 44113-3316 | 8/19/04 | |
| Kathryn | L | Francis | 1951 W 25th St | Cleveland | 44113-3418 | 8/19/04 | |
| Althea | A | Collins | 2051 W 19th St UP | Cleveland | 44113-3548 | 8/19/04 | |
| Robert | E | Bierce | 2000 Seranton Rd 5013 | Cleveland | 44113-3554 | 8/19/04 | |
| Kouita | S | Borders | 2098 W 11th St | Cleveland | 44113-3654 | 8/19/04 | |
| Michael | L | Clark | 2085 W 10th St | Cleveland | 44113-3658 | 8/19/04 | |
| Miriam | | Torres | 2142 W 10th St | Cleveland | 44113-3659 | 8/19/04 | |
| Jewel | | Rogers | 3225 Lorain Ave | Cleveland | 44113-3701 | 8/19/04 | |
| Ron | H | Fredrick | 3200 Lorain Ave | Cleveland | 44113-3702 | 8/19/04 | |
| Mark | | Stevenson | 3536 Lorain Ave | Cleveland | 44113-3704 | 8/19/04 | |
| Marvin | L | Raum | 2160 W 40th Pl 2 | Cleveland | 44113-3845 | 8/19/04 | |
| Frances | | Torres | 2237 W 33rd St | Cleveland | 44113-3905 | 8/19/04 | |
| Duice | M | Barrientos | 2117 W 33rd Pl | Cleveland | 44113-3907 | 8/19/04 | |
| Ida | | Wilhelmina | 3200 Monroe Ave | Cleveland | 44113-3950 | 8/19/04 | |
| Marta | | Lopez | 2117 W 31st St | Cleveland | 44113-4015 | 8/19/04 | |
| Desmond | | Green | 2207 W 30th St | Cleveland | 44113-4049 | 8/19/04 | |
| Corrie | A | Minor | 2128 W 19th St Apt 3 | Cleveland | 44113-4274 | 8/19/04 | |
| Kiesha | M | Tripp | 2461 W 11th St | Cleveland | 44113-4401 | 8/19/04 | |
| Jose | | Russel | 1210 Kenilworth Ave | Cleveland | 44113-4417 | 8/19/04 | |
| Mary | | Smith | 2304 W 7th St 12 | Cleveland | 44113-4508 | 8/19/04 | |
| Karen | | Pierre | 2516 W 7th St | Cleveland | 44113-4508 | 8/19/04 | |
| Tianna | S | Watts | 2531 W 6th Pl #D | Cleveland | 44113-4528 | 8/19/04 | |
| Michael | C | Hariston | 2585 W 5th St Apt C | Cleveland | 44113-4563 | 8/19/04 | |

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|-----------|---|--------------|----|-------------------------|-----------|------------|---------|--|
| Jamie | E | Glover | | 2567 W 5th St | Cleveland | 44113-4565 | 8/19/04 | |
| Robert | L | Abernathy | | 2559 W 5th St | Cleveland | 44113-4566 | 8/20/04 | |
| Thomas | C | Hopper | | 2559 W 5th St 2 | Cleveland | 44113-4566 | 8/19/04 | |
| Rosolyn | R | Carter | | 2551 W 5th St Apt H | Cleveland | 44113-4567 | 8/19/04 | |
| Cory | W | Reese | | 2541 W 5th St | Cleveland | 44113-4568 | 8/19/04 | |
| Kenya | L | Myers | | 2529 W 5th St Apt J | Cleveland | 44113-4570 | 8/19/04 | |
| Maleeka | D | Middlebrooks | | 2521 W 5th St | Cleveland | 44113-4571 | 8/19/04 | |
| Ron | | Sims | | 2503 W 5th St Apt A | Cleveland | 44113-4573 | 8/19/04 | |
| Charles | D | Vanhorn | Jr | 2503 W 5th St Apt F | Cleveland | 44113-4573 | 8/19/04 | |
| Andre | | Thompson | | 2521 W 6th St | Cleveland | 44113-4575 | 8/19/04 | |
| Mustafia | Z | Jefferson | | 2565 W 7th St Apt D | Cleveland | 44113-4584 | 8/19/04 | |
| Chris | | Jones | | 2525 W 7th St | Cleveland | 44113-4587 | 8/19/04 | |
| John | | Walsh | | 2792 W 32nd St | Cleveland | 44113-4706 | 8/19/04 | |
| Kimberly | | Wade | | 2558 W 25th St #501 | Cleveland | 44113-4707 | 8/19/04 | |
| Al | D | James | | 2576 W 25th St 4 | Cleveland | 44113-4708 | 8/19/04 | |
| Donell | | Edmond | | 2609 W 25th St | Cleveland | 44113-4731 | 8/19/04 | |
| Magaly | | Rodriguez | | 3014 Barber Ave | Cleveland | 44113-4753 | 8/19/04 | |
| Jimmy | | Oa | | 2730 W 30th St | Cleveland | 44113-4804 | 8/19/04 | |
| Latoya | L | Wilson | | 2998 W 38th St | Cleveland | 44113-4924 | 8/19/04 | |
| Dionne | L | Forpahl | | 3426 Seymour Ave | Cleveland | 44113-4929 | 8/19/04 | |
| John | D | Santler | | 3444 Walton Ave | Cleveland | 44113-5040 | 8/19/04 | |
| Sarina | | Williams | | 3038 Walton Ave | Cleveland | 44113-5040 | 8/19/04 | |
| Charra | | Marellis | | 3104 Walton Ave | Cleveland | 44113-5102 | 8/19/04 | |
| Jose | N | Rodeza | | 1458 W 25th St 4 | Cleveland | 44113-5255 | 8/19/04 | |
| Erik | A | Gonzalez | | 3040 W 14th St | Cleveland | 44113-5500 | 8/19/04 | |
| Jennifer | I | Knickle | | 1211 W 9th St | Cleveland | 44114-1126 | 8/19/04 | |
| Eddie | | Shelton | | 2102 Lakeside Ave | Cleveland | 44114-1215 | 8/19/04 | |
| Walter | | Perry | | 522 Superior Ave 302 | Cleveland | 44114-1807 | 8/20/04 | |
| Major | L | Riegins | Jr | 1380 E 13th St | Cleveland | 44114-1825 | 8/19/04 | |
| Reba | L | Cloud | | 1040 Saint Clair Ave NE | Cleveland | 44114-2003 | 8/19/04 | |
| Markeisha | B | Johnson | | 1543 Saint Clair Ave NE | Cleveland | 44114-2108 | 8/19/04 | |
| Freddie | | Strackhouse | | 1838 Superior Ave | Cleveland | 44114-2130 | 8/19/04 | |
| Pamela | M | Shorter | | 1850 Superior Ave | Cleveland | 44114-2134 | 8/19/04 | |
| Barbara | C | Johnson | | 1873 Superior Ave | Cleveland | 44114-2135 | 8/19/04 | |
| John | | Rivers | | 1512 E 19th St Apt 25B | Cleveland | 44114-2138 | 8/19/04 | |
| Dyon | J | Law | | 151 E 19th St | Cleveland | 44114-2138 | 8/19/04 | |
| Janice | D | Daniels | | 1512 E 19th St #24-B | Cleveland | 44114-2138 | 8/19/04 | |

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|-----------|---|----------|----|-------------------------|-----------|------------|---------|--|
| Ebony | L | Rice | | 275 Euclid Ave #14 | Cleveland | 44114-2205 | 8/19/04 | |
| Damone | K | Thompson | | 1012 Superior Ave | Cleveland | 44114-2515 | 8/19/04 | |
| Stacy | M | Hopskin | | 1484 Superior Ave | Cleveland | 44114-2904 | 8/19/04 | |
| Kimbrogh | D | Lavoris | | 1525 Superior Ave | Cleveland | 44114-2905 | 8/19/04 | |
| Danny | R | Johnson | | 1512 Superior Ave 3B | Cleveland | 44114-2906 | 8/19/04 | |
| Vaughn | R | McClint | | 1736 Payne Ave | Cleveland | 44114-2910 | 8/19/04 | |
| Gregory | H | Neilson | | 1701 E 12th St | Cleveland | 44114-3236 | 8/19/04 | |
| Brendan | P | Sweeney | | 1701 E 12th St | Cleveland | 44114-3236 | 8/19/04 | |
| Dennis | W | Jarecke | | 1701 E 12th St | Cleveland | 44114-3236 | 8/19/04 | |
| Marco | S | Martello | | 1701 E 12th St | Cleveland | 44114-3236 | 8/19/04 | |
| Jessie | M | Foltz | | 1701 E 12th St 206W | Cleveland | 44114-3236 | 8/19/04 | |
| Ramon | J | Milano | | 1801 E 12th St | Cleveland | 44114-3500 | 8/19/04 | |
| Eric | D | Rose | | 3439 Superior Ave | Cleveland | 44114-4124 | 8/19/04 | |
| Michael | I | Moss | | 3439 Superior Ave 306-E | Cleveland | 44114-4124 | 8/19/04 | |
| Willie | M | Williams | | 2900 Superior Ave | Cleveland | 44114-4202 | 8/19/04 | |
| Michale | L | Rogers | | 3642 Payne Ave | Cleveland | 44114-4316 | 8/19/04 | |
| David | T | Crumbsy | | 1260 Prospect Ave 501 | Cleveland | 44115-1210 | 8/19/04 | |
| Bennie | C | Anthony | Jr | 1017 Prospect Ave 803 | Cleveland | 44115-1226 | 8/19/04 | |
| Joseph | M | Rutledge | | 1127 Euclid Ave | Cleveland | 44115-1601 | 8/19/04 | |
| Warren | F | Clayton | | 1127 Euclid Ave | Cleveland | 44115-1601 | 8/19/04 | |
| Robert | T | Hill | | 1127 Euclid Ave | Cleveland | 44115-1601 | 8/19/04 | |
| Kishaun | R | Cotchery | | 1540 Euclid Ave 428 | Cleveland | 44115-2103 | 8/19/04 | |
| Robert | F | David | | 1793 Euclid Ave | Cleveland | 44115-2105 | 8/19/04 | |
| William | H | Seng | | 2130 Euclid Ave | Cleveland | 44115-2215 | 8/19/04 | |
| Karel | A | Smith | | 2130 Euclid Ave | Cleveland | 44115-2215 | 8/19/04 | |
| Alyssa | M | Bender | | 2130 Euclid Ave | Cleveland | 44115-2215 | 8/19/04 | |
| Lawana | M | Anderson | | 2130 Euclid Ave | Cleveland | 44115-2215 | 8/19/04 | |
| Christy | A | Lewis | | 2130 Euclid Ave #91 | Cleveland | 44115-2411 | 8/19/04 | |
| John | R | Seng | | 2741 Euclid Ave 12 | Cleveland | 44115-2411 | 8/19/04 | |
| Michelle | S | Fowler | | 2757 Euclid Ave 7 | Cleveland | 44115-2411 | 8/19/04 | |
| Dominique | L | Jones | | 2961 Euclid Ave | Cleveland | 44115-2415 | 8/19/04 | |
| David | I | Williams | | 3259 Euclid Ave | Cleveland | 44115-2509 | 8/19/04 | |
| Karina | D | Cooper | | 1066 Carnegie Ave | Cleveland | 44115-2804 | 8/19/04 | |
| Nona | M | Smith | | 2219 E 22nd St | Cleveland | 44115-2914 | 8/19/04 | |
| Kimberly | A | Wilson | | 2606 Cedar Ave 2 | Cleveland | 44115-2943 | 8/19/04 | |
| Willie | S | Jackson | | 2198 E 37th St | Cleveland | 44115-3009 | 8/19/04 | |
| Fredlie | | Johnson | | | Cleveland | | | |

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|------------|---|-----------|-----------------------------|----------------------|------------|---------|----------------------------|
| Denice | L | Pratt | 2858 S Moreland Blvd | Cleveland | 44120-2317 | 8/20/04 | Extra Census map - 10/1/05 |
| Joe | | Bead | 2920 E 118th St | Cleveland | 44120-2604 | 8/19/04 | None |
| Leah | | Love | 11828 Honeydale Ave 8 | Cleveland | 44120-2636 | 8/18/04 | None |
| Christel | N | Johnson | 2931 E 128th St | Cleveland | 44120-2667 | 8/20/04 | None |
| William | E | Bacon | 12800 Signet Ave | Cleveland | 44120-3173 | 8/19/04 | None |
| Richard | | Johnson | 3578 E 139th St | Cleveland | 44120-4571 | 8/20/04 | None |
| Alfonzo | D | Russell | 3541 E 146th St | Cleveland | 44120-4828 | 8/20/04 | None |
| Rebecca | M | Mynatt | 3646 Menlo Rd | Shaker Heights | 44120-5057 | 8/19/04 | None |
| Krista | | Nowack | 7825 Joyce Dr | Parma | 44120-7150 | 8/20/04 | Smiley? |
| Eric | | Nowack | 2011 Green Rd UP | Parma | 44120-7150 | 8/20/04 | |
| James | M | Daniels | 2057 Green Rd | Cleveland | 44121-1109 | 8/20/04 | None |
| Jasmine | A | Hardy | 2260 Greenvale Rd | Cleveland | 44121-1115 | 8/19/04 | None |
| Lea | A | Johnson | 2008 Cliffview Rd | Cleveland | 44121-1262 | 8/19/04 | None |
| Charles | | Williams | 1325 Yellowstone Rd | Cleveland Heights | 44121-1510 | 8/19/04 | None |
| William | | Clark | 3519 Radcliff Rd | Cleveland Heights | 44121-1547 | 8/19/04 | None |
| John | J | Johnson | 1633 Wood Rd | Cleveland | 44121-1743 | 8/20/04 | None |
| Eddy | J | Jackson | 3739 Mayfield Rd Apt 202 | Cleveland | 44121-1751 | 8/20/04 | Monick's from Helly |
| Jaynee | A | Prak | 1480 Crest Rd Apt 3 | Cleveland | 44121-1769 | 8/20/04 | None |
| Michael | P | Watts | 1120 Cleveland Heights Blvd | Cleveland Heights | 44121-1822 | 8/19/04 | None |
| Thomas | | Miller | 863 Beverly Rd | Cleveland Heights | 44121-2003 | 8/19/04 | None |
| Cherrie | N | Allen | 887 Englewood Rd | Cleveland Heights | 44121-2041 | 8/19/04 | None |
| Regina | | Stewart | 2486 Noble Rd #7-21 | Cleveland Heights | 44121-2132 | 8/19/04 | Isidoro, M.M. |
| Wagoria | | Thompson | 1113 Avondale Rd | South Euclid | 44121-2528 | 8/20/04 | None |
| Matthew | T | Berkowitz | 1015 Argonne Rd | South Euclid | 44121-2914 | 8/20/04 | None |
| Lamarhus | D | Brown | 1015 Pierrmont Rd | South Euclid | 44121-2934 | 8/19/04 | None |
| Anita | | Brannon | 2246 S Green Rd | Cleveland | 44121-3324 | 8/20/04 | None |
| Walter | D | Spencer | 4746 Burger Rd | South Euclid | 44121-3831 | 8/19/04 | None |
| Aron | K | Greenberg | 23302 E Baintree Rd | Shaker Heights | 44122-1246 | 8/19/04 | None |
| Harry | D | Schnur | 46 Lyman Cir | Shaker Heights | 44122-2119 | 8/19/04 | None |
| Raymond | G | Daley | 19115 Shaker Blvd | Shaker Heights | 44122-2545 | 8/19/04 | None |
| Tawonne | L | Hendking | 27600 Chagrin Blvd Ste 176 | Woodmere | 44122-4421 | 8/19/04 | OFFICE BLDG. |
| Keny | | Walker | 19224 Scottsdale Blvd | Shaker Heights | 44122-6418 | 8/19/04 | Garage - none |
| Acquanetta | D | Wells | 3885 E 188th St | Cleveland | 44122-6562 | 8/19/04 | None |
| Robert | | Herman | 19411 Harvard Ave | Warrensville Heights | 44122-6818 | 8/19/04 | None |
| Tanya | J | Mitchell | 19456 Brookfield Ln | Warrensville Heights | 44122-7029 | 8/19/04 | None |
| James | A | Freedman | 24101 Lake Shore Blvd | Euclid | 44123-1225 | 8/19/04 | None |

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|-----------|---|------------|--------------------------------|------------------|------------|---------|------------------------|
| Walter | E | Neil | 24101 Lake Shore Blvd | Euclid | 44123-1225 | 8/19/04 | Walters, Stacey Apt 15 |
| Shankia | D | Lewis | 24455 Lake Shore Blvd Apt 713 | Euclid | 44123-1253 | 8/19/04 | Walters, Stacey Apt 15 |
| Ambra | R | Moss | 24451 Lake Shore Blvd Apt 913 | Euclid | 44123-1254 | 8/19/04 | Walters, Stacey Apt 15 |
| Jesse | E | Bodnarik | 24101 Lake Shore Blvd Apt 701A | Euclid | 44123-1268 | 8/19/04 | Walters, Stacey Apt 15 |
| Stephanie | R | Paulk | 24455 Lake Shore Blvd E-810 | Euclid | 44123-1273 | 8/20/04 | Walters, Stacey Apt 15 |
| Bryan | C | Perry | 861 E 232nd St | Euclid | 44123-2511 | 8/19/04 | Walters, Stacey Apt 15 |
| Renito | E | Jackson | 24101 Lake Shore Blvd Apt 901A | Euclid | 44123-4211 | 8/19/04 | Walters, Stacey Apt 15 |
| Mackie | A | Dieng | 24801 Lake Shore Blvd Apt 901H | Euclid | 44123-4232 | 8/19/04 | Walters, Stacey Apt 15 |
| John | L | Derrico | 397 E 222nd St Apt B24 | Euclid | 44123-4701 | 8/19/04 | Walters, Stacey Apt 15 |
| Herschel | L | Crawford | 6310 Adair Dr | Brook Park | 44123-3805 | 8/19/04 | Walters, Stacey Apt 15 |
| Donna | | Smith | 4657 Warner Rd Apt 2 | Garfield Heights | 44125-1217 | 8/19/04 | Walters, Stacey Apt 15 |
| Karla | | Harrett | 4651 Warner Rd 03 | Garfield Heights | 44125-1256 | 8/20/04 | Walters, Stacey Apt 15 |
| Joshua | A | Lieberum | 10009 Plymouth Ave | Garfield Heights | 44125-2518 | 8/19/04 | Walters, Stacey Apt 15 |
| Gregory | D | Lubecki | 12024 Granger Rd | Garfield Heights | 44125-2935 | 8/19/04 | Walters, Stacey Apt 15 |
| Donald | | Williams | 5269 E 126th St | Garfield Heights | 44125-3022 | 8/19/04 | Walters, Stacey Apt 15 |
| Ashley | | Everett | 5269 E 126th St | Garfield Heights | 44125-3022 | 8/19/04 | Walters, Stacey Apt 15 |
| Danielle | S | Coleman | 5269 E 126th St Apt 202 | Garfield Heights | 44125-3022 | 8/19/04 | Walters, Stacey Apt 15 |
| Fanny | R | Taphiarini | 12404 Darlington Ave | Garfield Heights | 44125-3751 | 8/19/04 | Walters, Stacey Apt 15 |
| Eric | | Desimone | 12328 Woodward Blvd | Garfield Heights | 44125-3811 | 8/19/04 | Walters, Stacey Apt 15 |
| Tyrone | J | Taylor | 13709 Eastwood Blvd | Garfield Heights | 44125-3918 | 8/19/04 | Walters, Stacey Apt 15 |
| Tiore | L | Brubaker | 5747 Turner Rd | Garfield Heights | 44125-4065 | 8/19/04 | Walters, Stacey Apt 15 |
| Monica | M | Brown | 4932 E 141st St 302-B | Garfield Heights | 44125-5058 | 8/19/04 | Walters, Stacey Apt 15 |
| Steven | M | Bauch | 13312 Rockside Rd | Garfield Heights | 44125-5168 | 8/19/04 | Walters, Stacey Apt 15 |
| John | L | Dalorio | 10007 Parkview Ave DN | Garfield Heights | 44125-6304 | 8/19/04 | Walters, Stacey Apt 15 |
| Maria | | Klippel | 22000 Westwood Rd | Fairview Park | 44126-1002 | 8/19/04 | Walters, Stacey Apt 15 |
| Anna | C | Lupson | 4209 W 223rd St | Fairview Park | 44126-1019 | 8/19/04 | Walters, Stacey Apt 15 |
| Helga | K | Folta | 21477 Mastick Rd | Fairview Park | 44126-3050 | 8/19/04 | Walters, Stacey Apt 15 |
| Isela | | Vega | 3166 E 49th St | Cleveland | 44127-1050 | 8/19/04 | Walters, Stacey Apt 15 |
| Richard | J | Thompson | 4511 Lester Ave | Cleveland | 44127-1163 | 8/19/04 | Walters, Stacey Apt 15 |
| Sena | M | Benefield | 4960 Broadway Ave | Cleveland | 44127-1169 | 8/19/04 | Walters, Stacey Apt 15 |
| Terri | | Green | 3467 E 53rd St | Cleveland | 44127-1653 | 8/20/04 | Walters, Stacey Apt 15 |
| Keana | D | Johnson | 5786 Portage Ave | Cleveland | 44127-1710 | 8/20/04 | Walters, Stacey Apt 15 |
| Renee | E | Barros | 5889 Cable Ave | Cleveland | 44127-1724 | 8/20/04 | Walters, Stacey Apt 15 |
| Lawrence | L | Fornby | 5801 Portage Ave | Cleveland | 44127-1739 | 8/20/04 | Walters, Stacey Apt 15 |
| Vincent | L | Johnson | 3311 E 65th St | Cleveland | 44127-1902 | 8/19/04 | Walters, Stacey Apt 15 |
| Thomas | | Anthony | 3395 E 70th St | Cleveland | 44127-2002 | 8/19/04 | Walters, Stacey Apt 15 |
| Stewart | | Graham | 3411 E 70th St | Cleveland | 44127-2004 | 8/19/04 | Walters, Stacey Apt 15 |

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|-----------|--------|-----------|------------------------|----------------------|------------|---------|------------------------------------|
| Joe | S | Caslichio | 3468 E 70th St | Cleveland | 44127-2005 | 8/19/04 | Not sure |
| George | E | Mynatt | 3449 E 69th St | Cleveland | 44127-2035 | 8/19/04 | Not sure |
| David | P | Thompson | 3768 E 142nd St | Cleveland | 44128-1007 | 8/19/04 | Not sure |
| Marcus | A | Randle | 3794 E 143rd St | Cleveland | 44128-1011 | 8/19/04 | Not sure |
| Michael | Blue | Blue | 3842 E 144th St | Cleveland | 44128-1017 | 8/19/04 | Not sure, not found of family |
| Ebony | M | Jefferson | 14415 Edgewood Ave | Cleveland | 44128-1051 | 8/19/04 | Not sure |
| Darnell | D | Jackson | 14120 Glendale Ave | Cleveland | 44128-1066 | 8/19/04 | Not sure, Not found of family |
| Ollica | E | Lyons | 3859 E 149th St | Cleveland | 44128-1103 | 8/19/04 | Not sure, Not found of family |
| Robert | Howard | Howard | 3775 E 154th St | Cleveland | 44128-1113 | 8/20/04 | Not sure, Not found of family |
| Dericka | V | Gale | 3817 E 154th St 4 | Cleveland | 44128-1115 | 8/19/04 | Not found |
| Terri | A | Smith | 3996 E 148th St | Cleveland | 44128-1151 | 8/19/04 | Not sure |
| Crystal | L | McCurry | 3940 E 153rd St | Cleveland | 44128-1167 | 8/19/04 | Not sure |
| James | C | William | 15609 Walden Ave | Cleveland | 44128-1246 | 8/20/04 | Not sure |
| Tony | Myron | Myron | 16306 Throckley Ave | Cleveland | 44128-1376 | 8/20/04 | Not sure |
| James | L | Hunt | 17316 Stockbridge Ave | Cleveland | 44128-1727 | 8/20/04 | Not sure |
| Ramous | D | Lewis | 4131 E 142nd St | Cleveland | 44128-1811 | 8/20/04 | Not sure |
| Wydel | J | Jordan | 4135 E 145rd St | Cleveland | 44128-1817 | 8/20/04 | Not sure |
| Thomas | M | Schervish | 4067 E 146th St | Cleveland | 44128-1825 | 8/20/04 | Not sure |
| John | D | Jones | 4401 E 142nd St | Cleveland | 44128-2307 | 8/20/04 | Not sure |
| Jonathan | E | Smith | 14118 Miles Ave | Cleveland | 44128-2329 | 8/19/04 | Not sure |
| Zedphery | | Williams | 4345 Lee Rd | Cleveland | 44128-2400 | 8/19/04 | Not sure, Relative of Jonathan A's |
| Ronald | C | Favors | 4305 E 164th St | Cleveland | 44128-2411 | 8/19/04 | Not sure |
| Jeremy | L | Smith | 4380 E 154th St 2 | Cleveland | 44128-2907 | 8/19/04 | Not sure |
| Cleatrice | | Copeland | 4477 E 154th St | Cleveland | 44128-2908 | 8/19/04 | Not sure, "Still in Seclusion"? |
| Charlie | | Baltimore | 4394 E 156th St | Cleveland | 44128-2911 | 8/19/04 | Not sure |
| Timothy | Perry | Perry | 15974 Seville Rd | Cleveland | 44128-3067 | 8/19/04 | Not sure |
| Jayson | K | Bolden | 16802 Palda Dr | Cleveland | 44128-3329 | 8/19/04 | Not sure |
| Mary | | Hudson | 17822 Miles Rd | Warrensville Heights | 44128-3431 | 8/19/04 | Not sure |
| Phillip | J | Barker | 16913 Langly Ave | Cleveland | 44128-3609 | 8/19/04 | Not sure |
| James | | Braxton | 16742 Glenpark Ave | Cleveland | 44128-3666 | 8/19/04 | Not sure |
| Anthony | R | Kellom | 16215 Bryce Ave | Cleveland | 44128-3701 | 8/19/04 | Not sure |
| Vashon | A | Stokes | 17225 Tarkington Ave | Cleveland | 44128-3725 | 8/20/04 | Not sure |
| Adida | | Welch | 4317 Northfield d | Warrensville Heights | 44128-4666 | 8/19/04 | Not sure |
| Sandy | S | Shirley | 4421 Granada Blvd 1 | Warrensville Heights | 44128-4823 | 8/20/04 | Not sure, Granada Apartments |
| Darren | B | Peoples | 4862 Walford Rd Apr 16 | Warrensville Heights | 44128-5108 | 8/20/04 | Not sure |
| David | | Stewart | 4793 Walford Rd | Warrensville Heights | 44128-5125 | 8/19/04 | Not sure |
| William | | | 4958 Caroline Dr | Warrensville Heights | 44128-5300 | 8/19/04 | Not sure |

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|-------------|---|-------------|-----|----------------------------|----------------------|------------|---------|--|
| Monica | T | Bowman | | 23755 Banbury Cir | Warrensville Heights | 44128-5308 | 8/19/04 | |
| Glen | | Mack | | 4901 Banbury Ct | Warrensville Heights | 44128-5332 | 8/20/04 | |
| Robert | L | Robinson | | 4925 Banbury Ct | Warrensville Heights | 44128-5340 | 8/19/04 | |
| Chauncy | L | McDowell | | 4680 Country Ln | Warrensville Heights | 44128-5813 | 8/19/04 | |
| Iimmie | N | Lasiter | | 4680 Country Ln | Warrensville Heights | 44128-5813 | 8/19/04 | |
| Cordell | S | Dixon | | 4681 Country Ln NA | Warrensville Heights | 44128-5859 | 8/19/04 | |
| Richie | | Huffman | III | | Warrensville Heights | 44128-5862 | 8/19/04 | |
| Juanita | A | Davis | | 4756 Country Ln | Warrensville Heights | 44128-5865 | 8/19/04 | |
| Abraham | I | Hutchinson | | 1800 Country Ln | Warrensville Heights | 44128-5868 | 8/19/04 | |
| Martie | L | Leverett | | 4800 Country Ln | Warrensville Heights | 44128-5868 | 8/20/04 | |
| Anibel | S | Bracetta | | 4800 Country Ln | Warrensville Heights | 44128-5868 | 8/19/04 | |
| Shalaina | J | Gooden | | 4421 Granada Blvd Apt 421 | Warrensville Heights | 44128-6002 | 8/19/04 | |
| Tyrone | D | Rembert | | 4490 Granada Blvd Apt 14 | Warrensville Heights | 44128-6016 | 8/19/04 | |
| Central | I | Chappell | | 4480 Granada Blvd | Warrensville Heights | 44128-6032 | 8/19/04 | |
| Thelma | I | Perkins | | 4460 Granada Blvd | Warrensville Heights | 44128-6034 | 8/19/04 | |
| Horace | I | Sanders | III | 4470 Granada Blvd | Warrensville Heights | 44128-6034 | 8/20/04 | |
| Ryan | C | Valenjevick | | 5230 Knollwood Dr Apt 4 | Parma | 44129-1010 | 8/19/04 | |
| Roberta | K | Mundorff | | 5267 Knollwood Dr | Parma | 44129-1023 | 8/19/04 | |
| John | J | Piruta | | 5346 Knollwood Dr Apt 4 | Parma | 44129-1613 | 8/19/04 | |
| Matthew | J | Gibson | | 5439 Knollwood Dr Apt 2 | Parma | 44129-1651 | 8/19/04 | |
| Bryan | C | Hurless | | 5692 Alber Ave | Parma | 44129-3329 | 8/19/04 | |
| Frank | | Jameson | | 8201 Thornton Dr | Parma | 44129-3900 | 8/20/04 | |
| Charles | R | Motley | Sr | 6169 Ridge Rd Apt 3 | Parma | 44129-4483 | 8/19/04 | |
| Steven | L | Blekely | | 5703 Sunderland Dr | Parma | 44129-4723 | 8/19/04 | |
| George | J | Wederisch | | 6400 W 564th St | Parma | 44129-5228 | 8/19/04 | |
| Clemmontee | | Colton | | 6841 Day Dr NA | Parma | 44129-5452 | 8/19/04 | |
| Dana | | West | | 8290 Stratford Dr | Parma | 44129-5510 | 8/19/04 | |
| Phillips | I | Epps | | 9631 Elsmere Dr | Parma | 44130-1626 | 8/19/04 | |
| Mike | M | Jones | | 6242 Mariana Dr | Parma Heights | 44130-2836 | 8/19/04 | |
| Deborah | | Troicky | | 6395 Old York Rd | Parma Heights | 44130-3023 | 8/19/04 | |
| Rhiana | G | Ring | | 6395 Princeton Ct NA | Parma Heights | 44130-4001 | 8/19/04 | |
| Will | A | Norris | II | 6923 York Rd | Parma Heights | 44130-4549 | 8/19/04 | |
| Iean | | Martinez | | 9235 N Church Dr Apt 301 | Parma Heights | 44130-4708 | 8/19/04 | |
| Christopher | I | Salata | | 15040 W Sprague Rd Apt J13 | Middleburg Heights | 44130-6990 | 8/19/04 | |
| John | | Newman | | 9840 Pleasant Lake Blvd | Parma | 44130-7441 | 8/19/04 | |
| Michael | G | Grakauskas | | 10277 S Lake Blvd | Parma | 44130-7557 | 8/19/04 | |
| Terrance | D | Thornton | Sr | 10724 W Sprague Rd | Parma | 44130-7709 | 8/19/04 | |

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|-------------|---|-------------|--------------------------------|--------------------|------------|---------|------|
| Caroline | | Audrey | 7073 W 150th St | Parma Heights | 44130-7825 | 8/19/04 | home |
| Susan | D | Stojanovic | 7071 W 130th St Apt 231H | Parma Heights | 44130-7911 | 8/19/04 | home |
| Christopher | P | Stapf | 6745 Engle Rd | Middleburg Heights | 44130-7993 | 8/19/04 | home |
| Dale | M | Glovitch | 5671 Chevrolet Blvd Apt 5 | Parma | 44130-8715 | 8/19/04 | home |
| Natalie | C | Phillips | 7842 Normandie Blvd "y" | Middleburg Heights | 44130-8814 | 8/19/04 | home |
| Andrew | M | Nagy | 11360 Cheyenne Trl 6 | Parma Heights | 44130-9019 | 8/19/04 | home |
| Scott | J | Novak | 102 E Schaaf Rd | Brooklyn Heights | 44131-1208 | 8/19/04 | home |
| Jason | M | Snider | 102 E Schaaf Rd | Brooklyn Heights | 44131-1222 | 8/19/04 | home |
| Katie | A | Farris | 6353 Gale Dr | Seven Hills | 44131-3126 | 8/19/04 | home |
| Najwa | F | Tabbas | 6434 Chestnut Rd | Independence | 44131-3311 | 8/19/04 | home |
| Roger | F | Willo | 2917 Shady Ln | Seven Hills | 44131-4333 | 8/19/04 | home |
| Ellen | F | Mueller | 7810 Hillside Rd | Independence | 44131-5406 | 8/19/04 | home |
| Monica | C | Kirkland | 364 E Pleasant Valley Rd | Seven Hills | 44131-5606 | 8/19/04 | home |
| Melissa | S | Cammarata | 7420 Brookside Rd | Independence | 44131-6423 | 8/19/04 | home |
| Danika | A | Turnage | 26241 Lake Shore Blvd Apt 563 | Euclid | 44132-1141 | 8/19/04 | home |
| Ebony | T | Coolsey | 26151 Lake Shore Blvd Apt 1513 | Euclid | 44132-1157 | 8/19/04 | home |
| James | D | Montgomery | 26940 Sidney Dr | Euclid | 44132-2902 | 8/19/04 | home |
| Jasmine | R | Hayetque | 26980 Sidney Dr | Euclid | 44132-2953 | 8/19/04 | home |
| Michael | A | Jackson | 1251 E 279th St | Euclid | 44132-3068 | 8/19/04 | home |
| Elizabeth | M | Heath | 1310 E 279th St 1 | Euclid | 44132-3073 | 8/19/04 | home |
| Donie | M | Conard | 27750 Sidney Dr | Euclid | 44132-3095 | 8/19/04 | home |
| Jasmine | A | Stillwagon | 27750 Sidney Dr | Euclid | 44132-3095 | 8/19/04 | home |
| Grace | Y | Boyd-Elmore | 1442 E 260th St 1620 | Euclid | 44132-3151 | 8/19/04 | home |
| Edward | L | Hood | 25111 Lake Shore Blvd A17 | Euclid | 44132-3920 | 8/19/04 | home |
| Robert | S | Bergfeld | 8410 Wallings Rd | North Royalton | 44133-2947 | 8/19/04 | home |
| Candace | | Gingerich | 12490 State Rd | North Royalton | 44133-3245 | 8/19/04 | home |
| Michael | | Koral | 7818 Royalton Rd | North Royalton | 44133-4708 | 8/19/04 | home |
| Jeremy | M | Mahon | 16094 Louis Dr | North Royalton | 44133-5514 | 8/19/04 | home |
| Jonathan | W | Roblin | 6471 Gady Rd | North Royalton | 44133-6315 | 8/19/04 | home |
| Sarah | E | Roberts | 8060 Springfield Dr | North Royalton | 44133-7018 | 8/19/04 | home |
| Heidi | M | Pimentel | 8244 Windsor Dr | North Royalton | 44133-7034 | 8/19/04 | home |
| Marcus | D | Johnson | 5767 Broadview Rd #108 | Parma | 44134-1681 | 8/19/04 | home |
| Robert | L | Allison | 1050 Omalley Dr Apt 203 | Parma | 44134-2035 | 8/20/04 | home |
| Brendon | R | McCourt | 3028 Torrington Ave | Parma | 44134-2216 | 8/20/04 | home |
| Megan | K | Delaney | 3714 Wood Ave | Parma | 44134-2332 | 8/20/04 | home |
| Robert | P | Suchon | 3317 Lucerne Ave | Parma | 44134-2631 | 8/19/04 | home |
| William | J | Brown | 2518 Stanfield Dr | Parma | 44134-5004 | 8/19/04 | home |

| | | | | | | | |
|-------------|---|-------------|---------------------------|---------------|------------|---------|-------------------|
| George | | Ash | 2818 Coventry Dr | Parma | 44134-5636 | 8/19/04 | home |
| Joseph | A | Mason | 6800 Sandy Hook Dr | Parma | 44134-6049 | 8/20/04 | home |
| Jason | A | Harding | 7660 Broadview Rd Apt 118 | Parma | 44134-6765 | 8/19/04 | not found |
| Iose | | Padilla | 4017 W 150th St | Cleveland | 44135-1301 | 8/19/04 | not found |
| Sean | | McGlothlin | 4298 Rocky River Dr | Cleveland | 44135-1951 | 8/19/04 | Cross Creek Apts. |
| Anwar | A | Saeed | 4235 W 146th St | Cleveland | 44135-2005 | 8/19/04 | home |
| Edward | E | Harris | 4178 W 143rd St | Cleveland | 44135-2048 | 8/19/04 | home |
| Marti | C | Freeman | 4121 W 144th St | Cleveland | 44135-2053 | 8/19/04 | home |
| Emmanuel | U | Jackson | 12908 Brookfield Ave | Cleveland | 44135-2230 | 8/19/04 | home |
| Richard | L | Daniel | 4472 W 136th St | Cleveland | 44135-2912 | 8/19/04 | home |
| Jason | R | Jackson | 4541 W 130th St #11 | Cleveland | 44135-3568 | 8/20/04 | home |
| Heidemarie | | Crites | 16204 McLeigrove Ave | Cleveland | 44135-4402 | 8/19/04 | home |
| Andrew | | Loftgren | 4689 W 146th St | Cleveland | 44135-4501 | 8/19/04 | home |
| Claudia | A | Ananias | 11831 Pearl Rd Apt 105 | Strongsville | 44136-3337 | 8/19/04 | home |
| James | J | Earey | 11831 Pearl Rd Apt 204 | Strongsville | 44136-3337 | 8/19/04 | home |
| Toby | D | Johnson | 16309 Pearl Rd | Strongsville | 44136-6039 | 8/19/04 | home |
| Christopher | I | Zawislanski | 16889 Rabbit Run Dr | Strongsville | 44136-6239 | 8/19/04 | home |
| Calvin | T | Herron | 14400 Grainger Rd | Maple Heights | 44137-1063 | 8/19/04 | home |
| Myrah | L | Gray | 5100 Lee Rd | Maple Heights | 44137-1229 | 8/19/04 | home |
| Antonio | | Gaines | 5361 Beechwood Ave | Maple Heights | 44137-2205 | 8/19/04 | home |
| Cianni | S | Bell | 19307 Libby Rd | Maple Heights | 44137-2349 | 8/19/04 | home |
| Willie | L | Atkins | 19414 Maple Heights Blvd | Maple Heights | 44137-2380 | 8/19/04 | home |
| David | J | Lee | 16510 Maple Heights Blvd | Maple Heights | 44137-2639 | 8/19/04 | home |
| Megan | M | Kreiny | 5442 Beechwood Ave | Maple Heights | 44137-2762 | 8/19/04 | home |
| Kenneth | | Garth | 14805 Reddingon Ave | Maple Heights | 44137-3221 | 8/19/04 | home |
| Darnell | E | Walker | 5678 South Blvd | Maple Heights | 44137-3440 | 8/19/04 | home |
| Gerald | L | Jones | 5471 Dalewood Ave | Maple Heights | 44137-3501 | 8/19/04 | home |
| Kalpanaben | C | Patel | 15300 Maple Park Dr | Maple Heights | 44137-4289 | 8/19/04 | home |
| Mathew | M | Pieting | 27054 Oakwood Dr Apt 103C | Olmsted Falls | 44138-1190 | 8/20/04 | home |
| Valerie | R | Bogucki | 8562 Oakridge Dr | Olmsted Falls | 44138-1865 | 8/19/04 | home |
| Alex | | Rinaldi | 23704 Sawmill Bnd | Olmsted Falls | 44138-2895 | 8/20/04 | home |
| Herman | N | Rudolph | 32593 Haver Hill Dr | Solon | 44139-1970 | 8/19/04 | home |
| Kathryn | W | Phillips | 27104 Normandy Rd | Bay Village | 44140-2328 | 8/19/04 | home |
| Michael | J | Pupacz | 489 Canterbury Rd | Bay Village | 44140-2408 | 8/19/04 | home |
| Jason | G | Crisp | 24451 Lake Rd 604 | Bay Village | 44140-2960 | 8/19/04 | home |
| Steve | N | Csanyni | 24455 Lake Rd #1105 | Bay Village | 44140-2960 | 8/19/04 | home |
| Michael | D | Bilan | 7787 Grenadier Ln | Brecksville | 44141-1037 | 8/20/04 | home |

| | | | | | | | | |
|-----------|------|-------------|----|---------------------------|-------------------|------------|---------|------------|
| Richard | A | Smolk | Jr | 433 Broadway Ave 01 | Bedford | 44146-2628 | 8/19/04 | h/m |
| Alonzo | G | Orr | | 481 Broadway Ave Apt 4 | Bedford | 44146-2719 | 8/19/04 | h/m |
| Markus | A | Jones | | 5988 Bear Creek Dr | Bedford Heights | 44146-2932 | 8/19/04 | h/m |
| Phillip | R | Littleton | | 6395 S Perkins Rd | Bedford Heights | 44146-3157 | 8/19/04 | h/m |
| Ryan | L | Brandenburg | | 450 Turner Rd | Bedford | 44146-3360 | 8/19/04 | h/m |
| Michael | T | Hannan | | 128 Forest Dr | Bedford | 44146-3533 | 8/20/04 | h/m |
| Richelle | | Lewert | | 66 Union St | Bedford | 44146-4522 | 8/19/04 | h/m |
| Carlos | Cole | | | 137 Union St | Bedford | 44146-4541 | 8/19/04 | h/m |
| James | R | Copley | | 26463 Solon Rd Apt 512 | Bedford | 44146-4733 | 8/19/04 | h/m |
| Catherine | M | Lehota | | 26463 Solon Rd Apt 513 | Bedford | 44146-4733 | 8/19/04 | Solon Club |
| Anthony | | DiGilio | | 26433 Solon Dr | Bedford | 44146-4749 | 8/19/04 | h/m |
| John | H | Young | | 26433 Solon Rd | Bedford | 44146-4749 | 8/19/04 | h/m |
| Tamika | M | Williams | | 26463 Solon Rd | Bedford | 44146-4761 | 8/19/04 | h/m |
| Cleveland | W | Gilmore | | 6628 Tamarrind Dr | Bedford Heights | 44146-4843 | 8/19/04 | h/m |
| Clarence | | Miller | | 7312 Kentucky Dr | Bedford | 44146-5701 | 8/19/04 | h/m |
| Andre | A | Wilson | | 22135 Libby Rd | Bedford Heights | 44146-5815 | 8/19/04 | h/m |
| Timothy | L | Owens | | 19655 Rockside Rd | Bedford | 44146-7203 | 8/19/04 | h/m |
| George | E | Brooks | | 19655 Rockside Rd | Bedford | 44146-7203 | 8/19/04 | h/m |
| Robin | S | Adams | | 1654 E Royalton Rd #3 | Bedford | 44147-2549 | 8/19/04 | h/m |
| Brandon | | Lee | | 1637 Valley Parkway Dr | Bedford Heights | 44147-3052 | 8/19/04 | h/m |
| Roger | A | Stevens | | 1000 Vineyard Dr | Bedford Heights | 44147-3392 | 8/19/04 | h/m |
| Claudia | K | Ortiz | | 1389 Apple Valley Ct | Bedford Heights | 44147-3640 | 8/19/04 | h/m |
| Theresa | C | Eiber | | 1295 Cloverberry Ct | Bedford Heights | 44147-3685 | 8/19/04 | h/m |
| Thomas | | Timmons | | 1700 Seneca Blvd #103 | Bedford Heights | 44147-3911 | 8/20/04 | h/m |
| Mary | | Lauren | | 20052 Idlewood Trl | Bedford Heights | 44149-3142 | 8/20/04 | h/m |
| Julie | B | Anderson | | 20466 Westwood Dr | Bedford Heights | 44149-3901 | 8/20/04 | h/m |
| Nicholas | | Planagan | | 20448 Scott Dr | Bedford Heights | 44149-4989 | 8/19/04 | h/m |
| Albert | A | Salim | | 17171 Greenwood Dr | Bedford Heights | 44149-5826 | 8/19/04 | h/m |
| Tierra | D | Barnes | | 1356 E 131st St | Cleveland | | 8/18/04 | h/m |
| Charles | | Tompkins | | 13995 Superior Rd Apt 510 | East Cleveland | | 8/19/04 | h/m |
| Darnell | F | Boylan | | 13995 Superior Rd Apt 704 | East Cleveland | | 8/19/04 | h/m |
| Adam | S | Wilcox | | 1834 W 54th St | Cleveland | | 8/20/04 | h/m |
| Molly | T | Daw | | 2862 Corydon Rd | Cleveland Heights | | 8/19/04 | h/m |
| Holly | M | Teron | | 622 North St | Brooklyn Heights | | 8/19/04 | h/m |

Exhibit 5

HIGHLY SUSPICIOUS LIST-OHIO

NOTE: Unable to pull voter registration cards in Cuyahoga county due to number of registrations they have received

| | |
|-------------------|----------|
| County | Cuyahoga |
| Mailed | 50,000 |
| Returned | 2,943 |
| Entered | 2496 |
| Reviewed | 950 |
| Suspicious | 50-80 |
| Highly Suspicious | 10 |

Highly Suspicious List

| First Name | Last Name | Address | Line 2 | City | Zip Code | County | P.O. Category | Card/Photo | Comment |
|---------------|-----------|----------------------------|--------|----------------|------------|----------|---------------|------------|-----------------|
| ✓ Jeffrey | Barnes | 2515 Jay Ave | | Cleveland | 44113-3033 | Cuyahoga | Other | Photo | "This Company" |
| ✓ T. Neferiff | Newton | 3330 Community College Ave | 24 | Cleveland | 44115-3323 | Cuyahoga | NSN | Photo | Locks on doors |
| ✓ Morgan | Schreiber | 3715 Greenwood Dr | | Moreland Hills | 44022 | Cuyahoga | NSN | (NO) | |
| ✓ Donald | Probert | 850 Smith Ct | | Rocky River | 44116 | Cuyahoga | NSN | (NO) | |
| ✓ Hosey | Amos | 8757 Brecksville Rd | | Brecksville | 44141-1919 | Cuyahoga | Other | Photo | Same as "The P. |
| ✓ Richard | Barkley | 8757 Brecksville Rd | | Brecksville | 44141-1919 | Cuyahoga | Other | Photo | Same as "The P. |
| ✓ Jerome | Simmons | 12716 Woodside Ave | | Cleveland | 44108-2427 | Cuyahoga | | Photo | Postman notes: |
| ✓ Tonya | George | 1710 Prospect Ave | | Cleveland | 44115-2322 | Cuyahoga | ANK | Photo | Postman notes: |
| ✓ Ramon | Marrero | 1710 Prospect Ave | | Cleveland | 44115-2322 | Cuyahoga | ANK | Photo | Postman notes: |
| ✓ Michael | Dawson | 569 E 102nd St | | Cleveland | 44108-1370 | Cuyahoga | Other | Photo | Postman notes: |

HIGHLY SUSPICIOUS LIST- OHIO

| Overview | |
|-------------------|----------|
| County | Cuyahoga |
| Mailed | 50,000 |
| Returned | 2,943 |
| Entered | 2496 |
| Reviewed | 950 |
| Suspicious | 50-80 |
| Highly Suspicious | 10 |

Highly Suspicious List

| First Name | Last Name | Address | Line 2 | City | Zip Code | County | P.O. Category | Card/Photo | Comment |
|-------------|-----------|----------------------------|--------|----------------|------------|----------|---------------|------------|------------------|
| Jeffrey | Barnes | 2515 Jay Ave | | Cleveland | 44113-3033 | Cuyahoga | Other | Photo | "This Company |
| T. Neferiff | Newton | 3330 Community College Ave | 24 | Cleveland | 44115-3323 | Cuyahoga | NSN | Photo | Locks on doors |
| Morgan | Schreiber | 3715 Greenwood Dr | | Moreland Hills | 44022 | Cuyahoga | NSN | No | |
| Donald | Probert | 850 Smith Ct | | Rocky River | 44116 | Cuyahoga | NSN | No | |
| Hosey | Amos | 8757 Brecksville Rd | | Brecksville | 44141-1919 | Cuyahoga | Other | Photo | Same as "The Pil |
| Richard | Barkley | 8757 Brecksville Rd | | Brecksville | 44141-1919 | Cuyahoga | Other | Photo | Same as "The Pil |
| Jerome | Simmons | 12716 Woodside Ave | | Cleveland | 44108-2427 | Cuyahoga | | Photo | Postman notes: " |
| Touya | George | 1710 Prospect Ave | | Cleveland | 44115-2322 | Cuyahoga | ANK | Photo | Postman notes: " |
| Ramon | Marrero | 1710 Prospect Ave | | Cleveland | 44115-2322 | Cuyahoga | ANK | Photo | Postman notes: " |
| Michael | Dawson | 569 E 102nd St | | Cleveland | 44108-1370 | Cuyahoga | Other | Photo | Postman notes: " |

HIGHLY SUSPICIOUS LIST-OHIO

Highly Suspicious List

| First Name | Last Name | Address | Line 2 | City | Zip Code | County | Card/Photo | Reg. Group | Comment |
|--------------|-----------|----------------------------|--------|-------------|------------|----------|------------|------------|----------------------|
| T. Nefertiti | Newton | 3330 Community College Ave | 24 | Cleveland | 44115-3323 | Cuyahoga | Photo | | Licks on doors |
| Hosey | Amos | 8757 Brecksville Rd | | Brecksville | 44141-1919 | Cuyahoga | Photo | | Same as "The Pilgrin |
| Richard | Barkley | 8757 Brecksville Rd | | Brecksville | 44141-1919 | Cuyahoga | Photo | | Same as "The Pilgrin |
| Jerome | Simmons | 12716 Woodside Ave | | Cleveland | 44108-2427 | Cuyahoga | Photo | | Licks vacant |
| Michael | Dawson | 569 E 102nd St | | Cleveland | 44108-1370 | Cuyahoga | Photo | | Licks vacant |

Exhibit 6

Cuyahoga County

Info Key: CF (couldn't find), VR (verified residential), P (photo), B (Business), O (Other)

| FIRST | LAST | SUF | ADDRESS 1 | CITY | ZIP | DATE | INFO/NOTES |
|-----------|-------------|-----|--------------------------|----------------|-------|---------|---|
| Nile | D Smith | | 114 Tressel St | Berea | 44017 | 8/19/04 | residential-several owners per Nexis |
| Joshua | S Sheppard | | 114 Tressel St 105 | Berea | 44017 | 8/19/04 | residential-several owners per Nexis |
| Jonathan | Babic | | 144 Tressel St | Berea | 44017 | 8/19/04 | residential-several owners per Nexis |
| John | M Mason | III | 144 Tressel St 305 | Berea | 44017 | 8/19/04 | residential-several owners per Nexis |
| Nicole | M Wending | | 171 E Center St | Berea | 44017 | 8/19/04 | residential-several owners per Nexis |
| Dana | C Hammond | | 171 E Center St 238 | Berea | 44017 | 8/19/04 | residential-several owners per Nexis |
| Stephanie | L Griffin | | 253 Beech St | Berea | 44017 | 8/19/04 | residential-several owners per Nexis |
| Emily | T Roll | | 253 Beech St | Berea | 44017 | 8/19/04 | residential-several owners per Nexis |
| Audry | Leonard | | 309 Beech St | Berea | 44017 | 8/19/04 | residential-several owners per Nexis |
| Lauren | E Welan | | 309 Beech St #NH | Berea | 44017 | 8/19/04 | residential-several owners per Nexis |
| Alana | C Iochum | | 65 Seminary St | Berea | 44017 | 8/19/04 | residential-several owners per Nexis |
| Charles | E Spradley | III | 77 W Bagley Rd 107 | Berea | 44017 | 8/19/04 | owner: Baldwin-Wallace College per County Auditor |
| Morgan | E Schreiber | | 3715 Greenwood Dr | Moreland Hills | 44022 | 8/19/04 | residential per County Auditor |
| John | A Rutter | III | 3740 Greenwood Dr | Moreland Hills | 44022 | 8/19/04 | checks out per Nexis |
| Patrick | E Myers | | 1359 W 93rd St | Cleveland | 44102 | 8/20/04 | residential per County Auditor |
| Orie | M Lewis | | 1427 W 84th St | Cleveland | 44102 | 8/20/04 | residential-several owners per Nexis |
| Awjanette | S Ford | | 1539 W 65th St | Cleveland | 44102 | 8/19/04 | on yahoo maps only |
| Rafael | Hernandez | | 1842 W 77th St | Cleveland | 44102 | 8/19/04 | no record whatsoever |
| Phillip | L Harris | | 1892 W 54th St | Cleveland | 44102 | 8/20/04 | on yahoo maps only |
| Guillermo | Torres | | 4512 Lorain Ave | Cleveland | 44102 | 8/20/04 | residential per Nexis |
| Detaz | Butterfield | | 116 Harvard Ave | Cleveland | 44105 | 8/20/04 | residential per Nexis |
| Mary | Kemp | | 1946 W 47th St | Cleveland | 44105 | 8/20/04 | residential vacant land per County Auditor |
| Tommy | J Foster | | 10621 Orville Ave | Cleveland | 44106 | 8/19/04 | on yahoo maps only |
| Aleisha | L Rice | | 2380 Parkway Dr J | Lakewood | 44107 | 8/19/04 | no record whatsoever |
| Crystal | Gillo | | 11112 Lake Shore Blvd | Bratenahl | 44108 | 8/19/04 | on yahoo maps only |
| Michael | C Jordan | | 16921 Lake Shore Blvd | Cleveland | 44110 | 8/19/04 | on yahoo maps only |
| Ronald | H Newberry | Jr | 10727 Bellare Rd Apt 201 | Cleveland | 44111 | 8/19/04 | residential-several owners per Nexis |
| Bill | D Smith | | 1234 W 10th St | Cleveland | 44113 | 8/19/04 | on yahoo maps only |
| Sharrice | M Henderson | | 1500 W 9th St | Cleveland | 44113 | 8/19/04 | no record whatsoever |
| Ohnisl | Marshall | | 1892 Detroit Ave #805 | Cleveland | 44113 | 8/19/04 | no record whatsoever |
| Britt | L Williams | | 2000 Washington Ave #209 | Cleveland | 44113 | 8/19/04 | on yahoo maps only |
| Ismael | Perez | | 3378 Franklin Blvd | Cleveland | 44113 | 8/20/04 | on yahoo maps only |
| Johnny | V Marciano | | 3712 Detroit Ave 17 | Cleveland | 44113 | 8/19/04 | on yahoo maps only |

| | | | | | | | | |
|-----------|------|----------------|-----|----------------------------|----------------------|------------|---------|--|
| Anthony | D | Hines | | 1637 E 18th St | Cleveland | 44114 | 8/19/04 | no record whatsoever |
| Willow | D | White | | 2130 Euclid Ave | Cleveland | 44115 | 8/19/04 | Cleveland State University-Student Housing |
| Sharonda | A | Bailey | | 1034 Lake Rd | Rocky River | 44116 | 8/19/04 | residential per County Auditor |
| Larasha | J | Harris | | 1390 Lake Rd | Rocky River | 44116 | 8/19/04 | on yahoo maps only |
| Nancy | J | Toigo | | 16700 Lake Rd 506 | Rocky River | 44116 | 8/19/04 | on yahoo maps only |
| Roderick | G | MacBain | | 2100 Lake Rd | Rocky River | 44116 | 8/20/04 | no record whatsoever |
| Donald | I | Probert | | 850 Smith Ct | Rocky River | 44116 | 8/19/04 | no record whatsoever |
| Tiffany | R | Pleasure | | 11615 N Park Blvd | Cleveland | 44118 | 8/19/04 | no record whatsoever |
| Amber | B | Williams | | 13896 Superior Rd 9 | East Cleveland | 44118 | 8/19/04 | no record whatsoever |
| Toya | | Davis-Hamilton | | 17913 Brazil Rd | Cleveland | 44119 | 8/20/04 | on yahoo maps only |
| Fawaz | H | El-Khatib | | 1716 S Lyn Cir | South Euclid | 44121 | 8/20/04 | residential per County Auditor |
| Erik | D | Schloss | | 27075 Shaker Blvd | Beachwood | 44122 | 8/19/04 | on yahoo maps only |
| Rumph | I | Hollis | | 4345 Lee Rd | Cleveland | 44122 | 8/20/04 | listed as apartment complex on yahoo |
| Kelly | R | Jacko | | 28266 Northwood Dr | Pepper Pike | 44124 | 8/20/04 | no record whatsoever |
| Manuel | L | Hudson | | 3925 E 144th St | Cleveland | 44128 | 8/20/04 | on yahoo maps only |
| Donte | M | Peterson | | 4380 E 154th | Cleveland | 44128 | 8/19/04 | residential per County Auditor |
| Laurence | D | Byrd | III | 4807 Lawrence Dr | Warrensville Heights | 44128 | 8/19/04 | no record whatsoever |
| Barbara | H | Walters | | 7988 Lakeview Dr | Parma | 44129 | 8/19/04 | no record whatsoever |
| Lydia | C | Emerson | | 19709 Wendy Dr | Middleburg Heights | 44130 | 8/19/04 | residential per County Auditor |
| Trista | N | Hoon | | 6658 Stoney Creek Dr | North Royalton | 44133 | 8/19/04 | no record whatsoever |
| Esa | M | Warren | | 6484 State Rd D-4 | Parma | 44134 | 8/19/04 | no record whatsoever |
| David | M | Orges | | 6900 State Rd 120 | Parma | 44134 | 8/19/04 | State House apartments |
| Phil | M | Reed | II | 11335 Central Park Blvd UP | Olmsted Falls | 44138 | 8/19/04 | no record whatsoever |
| Randy | L | Robinson | | 2597 Locust Dr | Olmsted Falls | 44138 | 8/19/04 | no record whatsoever |
| Alanna | M | Foglietti | | 6625 Chagrin River Rd | Solon | 44139 | 8/19/04 | residential per County Auditor |
| Steve | | Thompson | | 1990 Millard Dr | Bay Village | 44140 | 8/19/04 | no record whatsoever |
| Heidi | V | McGuire | | 3265 Millard Dr | Bay Village | 44140 | 8/19/04 | no record whatsoever |
| Merleen | M | Franks | | 3272 Millard Dr #5 | Bay Village | 44140 | 8/19/04 | no record whatsoever |
| Joseph | L | Turnage | | 5988 Engle Rd | Brook Park | 44142 | 8/20/04 | residential per County Auditor |
| Bertha | | Hall | | 1917 Longspur Rd | Highland Heights | 44143 | 8/19/04 | no record whatsoever |
| Kenneth | Pope | | | 629 Locke Dr | Highland Heights | 44143 | 8/19/04 | no record whatsoever |
| Mark | D | Williams | | 26463 Solon Rd Club 111 | Oakwood | 44146 | 8/19/04 | residential per Nexis |
| Tamara | D | Keeton | | 9242 Stafford Dr | Strongsville | 44149 | 8/19/04 | no record whatsoever |
| Tamara | D | Keeton | | 9424 Stafford Dr | Strongsville | 44149 | 8/19/04 | no record whatsoever |
| Demetrius | | Blackwell | | 1717 W 58th St | Cleveland | 44402 | 8/19/04 | on yahoo maps only |
| David | A | King | | 5960 Engle Rd | Brook Park | 4224-2136 | 8/19/04 | residential per Nexis |
| Daniel | | Harmon | | 889 Arden Ave | Berea | 44017-1168 | 8/19/04 | residential per Nexis |

| | | | | | | | |
|-------------|---|------------|---------------------------|---------------|------------|---------|--|
| Joshua | S | Landis | 244 Barbary Dr | Berea | 44017-1206 | 8/19/04 | Berea Children's Group Home; http://www.bchfs.org/location |
| Yelena | | Gagnipw | 188 Edgewood Dr UP | Berea | 44017-1412 | 8/19/04 | on yahoo maps only |
| Alison | D | Dejesus | 654 Front St | Berea | 44017-1607 | 8/19/04 | yahoo maps only, in between two rail tracks? |
| Michelle | A | Erdman | 80 Emerson Dr | Berea | 44017-1676 | 8/19/04 | commercial per County Auditor |
| Nicole | Y | Hanible | 22 W 5th Ave Apt C1 | Berea | 44017-1740 | 8/19/04 | residential per Nexis |
| John | L | Feldman | 375 Front St Apt A8 | Berea | 44017-1742 | 8/20/04 | residential per Nexis |
| James | L | Boles | 287 W Bagley Rd | Berea | 44017-1865 | 8/19/04 | residential per Nexis |
| Mary | C | Dumont | 210 Mulberry St Apt 22 | Berea | 44017-1869 | 8/20/04 | apartments per County Auditor |
| Eddie | J | Wright | 100 Front St P | Berea | 44017-1913 | 8/19/04 | on yahoo maps only |
| Christopher | R | Fouser | 205 Front St | Berea | 44017-1921 | 8/19/04 | residential per Nexis |
| Laura | T | Cleveland | 616 Falls Rd | Chagrin Falls | 44022-2561 | 8/19/04 | residential per County Auditor |
| Christopher | L | Cessariti | 63 E Summit St | Chagrin Falls | 44022-2709 | 8/20/04 | residential per Nexis |
| Edward | W | Smith | 196 Vincent St | Chagrin Falls | 44022-2951 | 8/20/04 | residential per County Auditor |
| Robin | | Carter | 38 S Franklin St | Chagrin Falls | 44022-3213 | 8/19/04 | on yahoo maps only |
| ilded | Y | Lee | 2859 Community Dr | Chagrin Falls | 44022-6678 | 8/19/04 | residential per Nexis |
| Paul | W | Yowell | 7926 Madison Ave | Cleveland | 44102-1058 | 8/20/04 | residential per County Auditor |
| Mark | | White | 1333 W 14th St | Cleveland | 44102-1307 | 8/19/04 | residential per Nexis |
| Iuan | A | Mays | 1355 W 16th St | Cleveland | 44102-1329 | 8/19/04 | residential per Nexis |
| Mohan | | Vasa | 1361 W 14th St | Cleveland | 44102-1353 | 8/19/04 | residential per Nexis |
| Dustin | M | Small | 1819 W 45th St | Cleveland | 44102-1450 | 8/19/04 | residential per County Auditor |
| Jason | S | Brisentine | 11011 Clifton Blvd | Cleveland | 44102-1532 | 8/20/04 | residential per Nexis |
| Erin | M | Pryor | 10710 Clifton Blvd | Cleveland | 44102-1547 | 8/19/04 | residential per Nexis |
| Christopher | H | Antonini | 10710 Clifton Blvd 1 | Cleveland | 44102-1547 | 8/19/04 | residential per Nexis |
| Keith | R | Jewell | 1380 W 11th St | Cleveland | 44102-1552 | 8/19/04 | residential per Nexis |
| Juanita | R | Fudge | 1380 W 11th St Apt 201 | Cleveland | 44102-1552 | 8/19/04 | residential per Nexis |
| Dante | M | Smith | 1220 W 104th St Apt 303 | Cleveland | 44102-1557 | 8/19/04 | residential per Nexis |
| Charla | | Malloy | 1309 W 103rd St | Cleveland | 44102-1622 | 8/19/04 | on yahoo maps only |
| Randall | T | Hunt | 1323 W 95th St | Cleveland | 44102-1712 | 8/19/04 | residential per Nexis |
| Katrina | L | Hope | 1440 W 85th St UP | Cleveland | 44102-1820 | 8/20/04 | residential per Nexis |
| Dennis | L | Brown | 1448 W 85th St | Cleveland | 44102-1820 | 8/20/04 | residential per Nexis |
| James | | Washington | 1375 W 87th St UP | Cleveland | 44102-1823 | 8/20/04 | on yahoo maps only |
| Janine | M | Douglas | 1316 W 87th St | Cleveland | 44102-1824 | 8/19/04 | residential per Nexis |
| Henry | J | Burny | 1314 W 93rd St | Cleveland | 44102-1836 | 8/20/04 | on yahoo maps only |
| Samantha | L | Bunting | 1453 W 85th St Apt 6 | Cleveland | 44102-1839 | 8/20/04 | residential per Nexis |
| Melissa | L | Burnett | 9505 Detroit Ave 905 | Cleveland | 44102-1851 | 8/20/04 | on yahoo maps only |
| Jason | | Vicario | 9520 Detroit Ave Apt 202 | Cleveland | 44102-1869 | 8/19/04 | residential per Nexis |
| Muhammad | A | Hafiz | 9520 Detroit Ave Apt 1013 | Cleveland | 44102-1873 | 8/19/04 | residential per Nexis |

| | | | | | | | |
|-------------|-------------|----|---------------------------|-----------|------------|---------|---|
| Charlesine | E Green | | 1361 W 91st St Apt 10 | Cleveland | 44102-1882 | 8/20/04 | residential per Nexis |
| Myron | D Warts | | 1360 W 80th St | Cleveland | 44102-1901 | 8/20/04 | residential per Nexis |
| Jason | L Weaver | | 1339 W 83rd St 12 | Cleveland | 44102-1905 | 8/19/04 | residential per Nexis |
| Jason | Williams | | 1394 W 83rd St | Cleveland | 44102-1906 | 8/19/04 | residential per Nexis |
| James | C Luster | | 1372 W 83rd St | Cleveland | 44102-1941 | 8/20/04 | residential per Nexis |
| David | Raymos | | 1359 W 83rd St | Cleveland | 44102-1945 | 8/20/04 | residential per Nexis |
| Maurice | A Davis | Jr | 1359 W 83rd St 15 | Cleveland | 44102-1945 | 8/20/04 | residential per Nexis |
| Marlena | M Malcolm | | 8107 Lake Ave | Cleveland | 44102-1956 | 8/19/04 | residential per Nexis |
| Kim | Perchinski | | 8013 Lake Ave | Cleveland | 44102-1958 | 8/19/04 | residential per Nexis |
| Edward | L Hill | | 1378 W 83rd St | Cleveland | 44102-1965 | 8/19/04 | residential per Nexis |
| Linda | M Hayes | | 7405 Herman Ave | Cleveland | 44102-2038 | 8/19/04 | residential per Nexis |
| Estanislao | T Ortiz | | 1331 W 70th St | Cleveland | 44102-2059 | 8/19/04 | residential per Nexis |
| Kevin | R Dirka | II | 1265 W 58th St | Cleveland | 44102-2145 | 8/19/04 | residential per yahoo |
| Anthony | D Thompson | | 11410 Detroit Ave | Cleveland | 44102-2316 | 8/19/04 | residential per County Auditor |
| Kenneth | J Humphries | Jr | 1419 W 112th St A | Cleveland | 44102-2347 | 8/19/04 | residential per Nexis |
| Kene | Johnson | | 1405 W 114th St | Cleveland | 44102-2362 | 8/19/04 | residential per Nexis |
| Edward | Ondreff | | 1472 W 112th St | Cleveland | 44102-2364 | 8/20/04 | residential per Nexis |
| Andre | R Foster | | 11210 Detroit Ave | Cleveland | 44102-2406 | 8/19/04 | residential per Nexis |
| Laroyal | J Underwood | | 1417 W 107th St Apt 2 | Cleveland | 44102-2419 | 8/20/04 | residential per Nexis |
| Roy | C Soto | | 11118 Detroit Ave Apt 304 | Cleveland | 44102-2439 | 8/19/04 | residential per Nexis |
| Steven | Mitchell | | 11110 Detroit Ave | Cleveland | 44102-2449 | 8/19/04 | residential per Nexis |
| Jessica | M Edwards | | 8805 Madison Ave Apt 4 | Cleveland | 44102-2751 | 8/19/04 | residential per Nexis |
| Aaron | Marinelli | | 8206 Detroit Ave | Cleveland | 44102-2843 | 8/20/04 | residential per Nexis |
| Anna | L Williams | | 8003 Detroit Ave | Cleveland | 44102-2854 | 8/19/04 | residential per Nexis |
| Tito | I Ruiz | | 1452 W 75th St | Cleveland | 44102-2902 | 8/19/04 | residential per Nexis |
| Michelle | A Moran | | 6514 W Clinton Ave | Cleveland | 44102-2906 | 8/19/04 | residential per Nexis |
| Nicole | Young | | 6915 Franklin Blvd 2 | Cleveland | 44102-2917 | 8/19/04 | residential per Nexis |
| Michelle | Young | | 6915 Franklin Blvd 2 | Cleveland | 44102-2917 | 8/19/04 | residential per Nexis |
| Charles | N Mixon | | 1978 W 75th St | Cleveland | 44102-2942 | 8/20/04 | on yahoo maps only |
| Salina | Jones | | 7409 Franklin Blvd Apt 2 | Cleveland | 44102-2965 | 8/19/04 | residential per Nexis |
| Miguel | Saucedo | Jr | 1435 W 57th St | Cleveland | 44102-3043 | 8/19/04 | residential per Nexis |
| Bennett | E Fox | | 6009 Bridge Ave | Cleveland | 44102-3118 | 8/20/04 | residential per Nexis |
| Christopher | L Lawson | | 1812 W 57th St | Cleveland | 44102-3209 | 8/19/04 | residential per Nexis-2 family home-yahoo |
| Cedric | B Jackson | Sr | 1812 W 57th St | Cleveland | 44102-3209 | 8/19/04 | residential per Nexis |
| Tito | Canoy | | 1908 W 57th St | Cleveland | 44102-3213 | 8/19/04 | residential per Nexis |
| Edilberto | Morals | | 5516 Lorain Ave | Cleveland | 44102-3236 | 8/19/04 | residential per Nexis |
| Jason | Jones | | 5309 Bridge Ave | Cleveland | 44102-3347 | 8/19/04 | residential per Nexis |

| | | | | | | | |
|-----------|---|-------------|-----------------------|-----------|------------|---------|--------------------------------|
| Gloria | S | Mejia | 4805 Lorain Ave B | Cleveland | 44102-3351 | 8/19/04 | residential per Nexis |
| Ricardo | L | Glen | 1453 W 48th St 3 | Cleveland | 44102-3359 | 8/19/04 | residential per Nexis |
| Jonathan | D | Williams | 1949 W 52nd St U/P | Cleveland | 44102-3366 | 8/19/04 | residential per Nexis |
| Edmanuel | | Sosa | 4828 Lorain Ave | Cleveland | 44102-3376 | 8/20/04 | residential per Nexis |
| Carlos | O | Perez | 4719 Bridge Ave | Cleveland | 44102-3423 | 8/19/04 | residential per Nexis |
| Sam | T | Thomas | 1958 W 48th St | Cleveland | 44102-3437 | 8/19/04 | residential per Nexis |
| Tracie | | Johnson | 1947 W 47th St | Cleveland | 44102-3454 | 8/19/04 | residential per Nexis |
| Domonique | S | King | 1947 W 47th St Apt 3 | Cleveland | 44102-3454 | 8/19/04 | residential per Nexis |
| Donna | | Mars | 1947 W 47th St Apt 5 | Cleveland | 44102-3454 | 8/19/04 | residential per Nexis |
| Johnnie | B | Smith | 2023 W 105th St Apt 1 | Cleveland | 44102-3553 | 8/19/04 | residential per Nexis |
| Samuel | P | Thomas | 2036 W 98th St | Cleveland | 44102-3602 | 8/19/04 | residential per Nexis |
| James | | Bonner | 3201 W 58th St | Cleveland | 44102-3607 | 8/20/04 | residential per Nexis |
| Linas | | Klimavicius | 2075 W 98th St | Cleveland | 44102-3650 | 8/19/04 | residential per Nexis |
| Deandre | | Smith | 2087 W 98th St | Cleveland | 44102-3653 | 8/19/04 | residential per Nexis |
| Franklin | R | Nolan | 7006 Detroit Ave | Cleveland | 44102-3656 | 8/19/04 | residential per Nexis |
| James | W | Robinson | 2104 W 93rd St | Cleveland | 44102-3704 | 8/20/04 | residential per Nexis |
| Francisca | A | Robinson | 2104 W 93rd St | Cleveland | 44102-3704 | 8/20/04 | residential per Nexis |
| Amy | | Dingess | 2118 W 93rd St | Cleveland | 44102-3704 | 8/19/04 | residential per Nexis |
| Adrian | | Goins | 2126 W 96th St | Cleveland | 44102-3708 | 8/20/04 | residential per Nexis |
| Tiffany | S | Davis | 9711 Lander Ave | Cleveland | 44102-3725 | 8/19/04 | residential per Nexis |
| Kevin | | O'Neal | 2130 W 95th St | Cleveland | 44102-3730 | 8/19/04 | residential per Nexis |
| Michelle | M | McDowell | 2010 W 95th St Apt 6 | Cleveland | 44102-3753 | 8/19/04 | residential per Nexis |
| Yasom | | Abasbalo | 2170 W 98th St | Cleveland | 44102-3758 | 8/20/04 | residential per Nexis |
| Felicia | N | Murrell | 2016 W 89th St | Cleveland | 44102-3818 | 8/19/04 | residential per Nexis |
| Jamie | L | Robidoux | 8704 Platten Ave | Cleveland | 44102-3829 | 8/19/04 | residential per Nexis |
| William | | Shannon | 6708 Wakefield Ave | Cleveland | 44102-3954 | 8/19/04 | residential per Nexis |
| Paul | | Red | 7106 Madison | Cleveland | 44102-4044 | 8/19/04 | on yahoo maps only |
| Milagros | | Caban | 2178 W 80th St | Cleveland | 44102-4159 | 8/19/04 | residential per Nexis |
| Herman | L | Lewis | 2042 W 73rd St #DN | Cleveland | 44102-4186 | 8/20/04 | on yahoo maps only |
| Reha | | Jordan | 7414 Colgate Ave | Cleveland | 44102-4229 | 8/19/04 | residential per Nexis |
| Anthony | G | Quanda | 7466 Colgate Ave 3 | Cleveland | 44102-4229 | 8/19/04 | on yahoo maps only |
| Dollie | M | Wimmer | 7616 Lorain Ave | Cleveland | 44102-4250 | 8/19/04 | residential per County Auditor |
| Brandon | D | Bates | 2108 W 73rd St Apt 2 | Cleveland | 44102-4262 | 8/19/04 | residential per Nexis |
| Danyell | N | Lockhart | 3256 W 98th St | Cleveland | 44102-4602 | 8/19/04 | residential per Nexis |
| Kim | S | Fuley | 3431 W 98th St | Cleveland | 44102-4605 | 8/20/04 | residential per County Auditor |
| Tina | M | Adkins | 3236 W 99th St | Cleveland | 44102-4610 | 8/19/04 | residential per County Auditor |
| Theodore | | Pickert | 9712 Almira Ave | Cleveland | 44102-4708 | 8/19/04 | residential per Nexis |

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| Margurita | Johnson | 3549 W 97th St | Cleveland | 44102-4728 | 8/20/04 | residential per Nexis |
| Warrell | Howze | 3122 W 88th St | Cleveland | 44102-4801 | 8/20/04 | residential per Nexis |
| Sherwin | Scott | 3197 W 90th St 2 | Cleveland | 44102-4805 | 8/19/04 | residential per Nexis |
| Mabel | Johnson | 3222 W 90th St | Cleveland | 44102-4808 | 8/19/04 | residential per County Auditor |
| Laroya | Q James | 3233 W 94th St | Cleveland | 44102-4815 | 8/19/04 | residential per County Auditor |
| Jeffrey | A Scamardo | 3481 W 94th St | Cleveland | 44102-4841 | 8/19/04 | residential per County Auditor |
| Aja | R Tisby | 9006 Denison Ave | Cleveland | 44102-4847 | 8/19/04 | residential per County Auditor |
| Angel | Mercardo | 3255 W 86th St | Cleveland | 44102-4940 | 8/19/04 | residential per County Auditor |
| José | Rodriguez | Jr 3210 W 73rd St | Cleveland | 44102-5213 | 8/20/04 | residential per Nexis |
| John | L Prim | 7101 Clark Ave | Cleveland | 44102-5224 | 8/20/04 | residential per Nexis |
| Mirna | E Melendez | 3566 W 63rd St | Cleveland | 44102-5408 | 8/20/04 | on yahoo maps only |
| Jennifer | L Shamblin | 3391 W 60th St | Cleveland | 44102-5528 | 8/19/04 | residential per County Auditor |
| Sheryl | A Nageotte | 3478 W 63rd St | Cleveland | 44102-5559 | 8/19/04 | residential per Nexis |
| José | Colon | 3124 W 58th St | Cleveland | 44102-5606 | 8/20/04 | residential per County Auditor |
| Bill | Wislon | 3154 W 61st St | Cleveland | 44102-5612 | 8/19/04 | residential per County Auditor |
| Pamela | S Boggs | 3461 W 58th St | Cleveland | 44102-5637 | 8/19/04 | on yahoo maps only |
| Rosa | E Colon | 3485 W 58th St | Cleveland | 44102-5637 | 8/19/04 | on yahoo maps only |
| Alberto | Rodriguez | 3351 W 59th Pl | Cleveland | 44102-5642 | 8/19/04 | residential per County Auditor |
| Jason | M Hagan | 3357 W 59th Pl | Cleveland | 44102-5642 | 8/19/04 | residential per County Auditor |
| Dina | Yonko | 3370 W 59th Pl | Cleveland | 44102-5643 | 8/19/04 | on yahoo maps only |
| Jeffrey | Braun | 3225 W 58th St | Cleveland | 44102-5657 | 8/19/04 | residential per County Auditor |
| Sylvette | M Gonzalez | 3501 W 59th St | Cleveland | 44102-5667 | 8/19/04 | residential per County Auditor |
| Craig | A Pearce | 3115 W 58th St UP | Cleveland | 44102-5671 | 8/19/04 | residential per County Auditor |
| Reginald | M Whitson | 3288 W 58th St 212 | Cleveland | 44102-5677 | 8/19/04 | residential per Nexis |
| Nancy | C Melcher | 3401 W 56th St | Cleveland | 44102-5719 | 8/19/04 | no record whatsoever |
| Ranasha | L Johnson | 3443 W 56th St | Cleveland | 44102-5719 | 8/19/04 | no record whatsoever |
| Jonathan | O Snyder | 3406 W 56th St | Cleveland | 44102-5720 | 8/19/04 | residential per County Auditor |
| Natalie | Gomez | 3462 W 54th St | Cleveland | 44102-5743 | 8/20/04 | no record whatsoever |
| Erica | E Rose | 3256 W 56th St UP | Cleveland | 44102-5747 | 8/19/04 | residential per County Auditor |
| Cas | Heard | 3231 W 54th St #2 | Cleveland | 44102-5758 | 8/19/04 | no record whatsoever |
| Dean | M Furcello | 3199 W 58th St UP | Cleveland | 44102-5760 | 8/19/04 | residential per County Auditor |
| Manual | D Rodriguez | 3287 W 56th St | Cleveland | 44102-5761 | 8/19/04 | residential per County Auditor |
| Rosa | K Hill | 3161 W 50th St | Cleveland | 44102-5835 | 8/19/04 | no record whatsoever |
| Emily | A Stewart | 3201 W 52nd St | Cleveland | 44102-5881 | 8/19/04 | residential per nexis |
| Karen | S Jones | 3153 W 48th St | Cleveland | 44102-5931 | 8/19/04 | residential per nexis |
| Albert | C Davis | Jr 3286 W 48th St | Cleveland | 44102-5934 | 8/19/04 | residential per nexis |
| Clifton | R Johnson | 3206 W 46th St | Cleveland | 44102-5969 | 8/19/04 | residential per nexis |

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| Nanon | I. Marshall | 11580 Tate Ave | Cleveland | 44102-6108 | 8/19/04 | residential per nexis |
| Julia | A. Marshall | 11580 Tate Ave | Cleveland | 44102-6108 | 8/19/04 | residential per nexis |
| Daniel | J. Guido | 1456 W 85th St | Cleveland | 44102-6602 | 8/20/04 | residential per nexis |
| James | H. Lipscomb | 1188 Norwood Rd | Cleveland | 44103-1588 | 8/19/04 | residential per nexis |
| Zsahneiscia | C. Jir | 1095 Addison Rd | Cleveland | 44103-1646 | 8/19/04 | residential per nexis |
| Jeff | Hall | 1217 E 71st St 2 | Cleveland | 44103-1936 | 8/19/04 | residential per nexis |
| Percy | Clark | 7610 Cornelia Ave | Cleveland | 44103-2014 | 8/19/04 | |
| Jennifer | A. Moore | 8014 Korman Ave | Cleveland | 44103-2138 | 8/19/04 | |
| Michael | W. Hochschild | 15757 Mandalay Ave DN | Cleveland | 44103-3214 | 8/19/04 | |
| Donnell | F. Younger | 1033 E 79th St | Cleveland | 44103-2169 | 8/19/04 | |
| Henry | D. Booker | 8110 Decker Ave | Cleveland | 44103-2998 | 8/20/04 | |
| Edwin | M. Gu | 7810 Cedar Ave Apt 3 | Cleveland | 44103-4964 | 8/19/04 | |
| Diane | Harris | 2478 E 83rd St #603 | Cleveland | 44104-2204 | 8/19/04 | |
| Terence | R. Grayer | 9619 Steinway Ave | Cleveland | 44104-3465 | 8/20/04 | |
| Armell | Wright | 10506 Grandview Ave | Cleveland | 44104-3501 | 8/19/04 | |
| Arriance | E. Wright | 10506 Grandview Ave | Cleveland | 44104-3521 | 8/19/04 | |
| Keyanna | N. Burton | 10309 Hulda Ave | Cleveland | 44104-3538 | 8/19/04 | |
| Demetrius | Vaden | 10309 Hulda Ave | Cleveland | 44104-3538 | 8/20/04 | |
| Sheryl | R. Cool | 10301 Shale Ave | Cleveland | 44104-3613 | 8/19/04 | |
| Dwayne | Hudson | 10406 Buckeye Rd | Cleveland | 44104-3727 | 8/19/04 | |
| Cynthia | Fantroy | 10310 Shaker Blvd | Cleveland | 44104-3778 | 8/19/04 | |
| Demetrius | J. Campbell | 9613 Heath Ave 1 | Cleveland | 44104-5515 | 8/19/04 | |
| Jason | A. Ettinger | 3667 E 57th St | Cleveland | 44105-1133 | 8/20/04 | |
| Melisa | D. Burress | 5608 Mound Ave | Cleveland | 44105-1168 | 8/19/04 | |
| Tanneka | A. Mitchell | 3725 E 65th St | Cleveland | 44105-1254 | 8/20/04 | |
| Tommy | O. Hobbs | 3715 E 61st St Apt 3 | Cleveland | 44105-1266 | 8/20/04 | |
| Chad | Richards | 3708 E 63rd St | Cleveland | 44105-1292 | 8/20/04 | |
| James | W. Robinson | Sr 3688 E 63rd St Apt 2 | Cleveland | 44105-1297 | 8/19/04 | |
| Kenyn | S. Zaid | 6603 Union Ave | Cleveland | 44105-1321 | 8/19/04 | |
| Tequita | S. Duke | 7209 Union Ave | Cleveland | 44105-1451 | 8/19/04 | |
| Tabrea | Q. Roberson | 6518 Chambers Ave Apt 5 | Cleveland | 44105-1486 | 8/19/04 | |
| Michael | Wright | 6518 Chambers Ave Apt 5 | Cleveland | 44105-1486 | 8/19/04 | |
| Michael | Wright | 6518 Chambers Ave Apt 5 | Cleveland | 44105-1486 | 8/19/04 | |
| Airane | B. Kennedy | 3545 E 81st St | Cleveland | 44105-1525 | 8/20/04 | |
| Dannell | D. Taylor | 9901 Union Ave 3 | Cleveland | 44105-1759 | 8/20/04 | |
| Yalonda | Moddy | 3534 E 108th St | Cleveland | 44105-1820 | 8/19/04 | |
| Kirk | L. Jones | 3556 E 118th St | Cleveland | 44105-1862 | 8/20/04 | |

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| Patrice | N Henderson | 3556 E 118th St | Cleveland | 44105-1862 | 8/20/04 | |
| Isabell | N Abdur-Razaque | 12310 Benham Ave | Cleveland | 44105-1912 | 8/20/04 | |
| James | D Brown | 9510 Anderson Ave | Cleveland | 44105-2206 | 8/20/04 | |
| Lowanda | D McMillan | 9602 Orleans Ave | Cleveland | 44105-2228 | 8/20/04 | |
| Marshall | G Fairfax | 9420 Dunlap Ave | Cleveland | 44105-2331 | 8/19/04 | |
| Lawrance | Pennyman | 3578 E 106th St | Cleveland | 44105-2418 | 8/20/04 | |
| Kim | T Starks | 10512 Sandusky Ave UP | Cleveland | 44105-2439 | 8/19/04 | |
| James | H Johnson | 3696 E 110th St | Cleveland | 44105-2468 | 8/19/04 | |
| Wanda | M Blair | 3617 E 116th St | Cleveland | 44105-2511 | 8/20/04 | |
| Steve | Smith | 3632 E 117th St | Cleveland | 44105-2517 | 8/20/04 | |
| Gerald | Macklin | 3652 E 117th St | Cleveland | 44105-2523 | 8/20/04 | |
| Earnest | Brooks | 11717 Faringdon Ave | Cleveland | 44105-2532 | 8/20/04 | |
| Kenneth | R Benton | 11717 Faringdon Ave | Cleveland | 44105-2532 | 8/20/04 | |
| Monique | A Simpson | 11718 Crave Ave | Cleveland | 44105-2577 | 8/20/04 | |
| Joshua | Hopkins | 3607 E 117th St Apt 2 | Cleveland | 44105-2588 | 8/19/04 | |
| Vince | Butler | 12718 Holborn Ave | Cleveland | 44105-2625 | 8/20/04 | |
| Anthony | D Oden | 12401 Craven Ave | Cleveland | 44105-2647 | 8/20/04 | |
| Louis | A Matrich | 3847 E 50th St UP | Cleveland | 44105-3311 | 8/19/04 | |
| Mike | G Brown | 3812 E 54th St | Cleveland | 44105-3350 | 8/20/04 | |
| Jessica | M Bennett | 7424 Ottawa Rd | Cleveland | 44105-3823 | 8/19/04 | |
| Larry | J Eskridge | 8415 Broadway Ave | Cleveland | 44105-3932 | 8/20/04 | |
| Claude | Amburgey | 8415 Broadway Ave | Cleveland | 44105-3932 | 8/20/04 | |
| Lavelle | A Gaddis | 8415 Broadway Ave | Cleveland | 44105-3932 | 8/20/04 | |
| Jerome | P Owens | 8415 Broadway Ave | Cleveland | 44105-3932 | 8/20/04 | |
| Teresa | D Cartwright | 1835 Harvard Ave #314 | Cleveland | 44105-3938 | 8/19/04 | |
| Ronda | M Thaxton | 7835 Harvard Ave | Cleveland | 44105-3938 | 8/19/04 | |
| Antoine | D Williams | 9617 Elizabeth Ave | Cleveland | 44105-4007 | 8/20/04 | |
| Theresa | Castleberry | 9806 Elizabeth Ave UP | Cleveland | 44105-4012 | 8/20/04 | |
| Gary | L Dancy | 3899 E 97th St | Cleveland | 44105-4053 | 8/20/04 | |
| Terry | Little | 10607 Nelson Ave | Cleveland | 44105-4254 | 8/19/04 | |
| Antonio | M Lewis | 11505 Dove Ave UP | Cleveland | 44105-4320 | 8/20/04 | |
| Nafisah | A Zahir | 4015 E 121st St | Cleveland | 44105-4552 | 8/20/04 | |
| Darryl | Moore | 13510 Benwood Ave | Cleveland | 44105-4610 | 8/19/04 | |
| Carisalle | L Robinson | 13601 Benwood Ave #3 | Cleveland | 44105-4611 | 8/20/04 | |
| Delbert | C Moore | 13908 Durkee Ave | Cleveland | 44105-4635 | 8/19/04 | |
| James | P Poor | 4080 E 127th St | Cleveland | 44105-4738 | 8/20/04 | |
| Sean | Boyd | 3937 E 53rd St | Newburgh Heights | 44105-4846 | 8/20/04 | |

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| Devon | G | Island | | 4073 E 76th St | Cleveland | 44105-5057 | 8/19/04 | |
| Jeanette | M | Ciganko | | 9205 Harvard Ave | Cleveland | 44105-5274 | 8/19/04 | |
| Henry | | Lewis | | 4125 E 110th St | Cleveland | 44105-5324 | 8/19/04 | |
| Sharmaine | M | Marthews | | 4110 E 123rd St DN | Cleveland | 44105-5413 | 8/20/04 | |
| Shala | | Tuistone | | 13904 Miles Ave UP | Cleveland | 44105-5533 | 8/20/04 | |
| Tom | | Roberts | | 12604 Miles Ave 3 | Cleveland | 44105-5539 | 8/20/04 | |
| Terrence | | Rose | | 8215 Force Ave | Cleveland | 44105-5815 | 8/20/04 | |
| Jennifer | | Havran | | 8104 Maryland Ave DN | Cleveland | 44105-5938 | 8/19/04 | |
| Demond | | Apples | | 11710 Robertson Ave | Cleveland | 44105-6223 | 8/19/04 | |
| Michael | T | Schade | | 4230 E 131st St | Cleveland | 44105-6350 | 8/19/04 | |
| Jodi | A | Love | | 7716 Bancroft Ave UP | Cleveland | 44105-6507 | 8/20/04 | |
| Dana | M | Smith | | 13695 S Parkway Dr | Garfield Heights | 44105-6837 | 8/19/04 | |
| Steven | O | Smith | | 4389 E 131st St UP | Garfield Heights | 44105-6945 | 8/19/04 | |
| Terese | M | Gregg | | 3907 E 71st | Cleveland | 44105-7310 | 8/19/04 | |
| Mario | | Phillips | Jr | 1425 E 85th St | Cleveland | 44106-1003 | 8/19/04 | |
| Paul | L | Finley | | 1397 E 93rd St | Cleveland | 44106-1005 | 8/19/04 | |
| Robert | | Ferguson | III | 1416 E 89th St | Cleveland | 44106-1026 | 8/19/04 | |
| Ken | D | Jackson | | 1360 E 90th St | Cleveland | 44106-1028 | 8/19/04 | |
| Parisio | B | Ortiz | | 1361 E 91st St | Cleveland | 44106-1031 | 8/19/04 | |
| Adrian | A | Tyes | | 1482 E 106th St | Cleveland | 44106-1105 | 8/19/04 | |
| Jerry | | Anthony | Jr | 1457 E 105th St | Cleveland | 44106-1137 | 8/19/04 | |
| Lenord | | Harris | | 1357 E 105th St | Cleveland | 44106-1139 | 8/19/04 | |
| Diana | | Wallace | | 10716 Lee Ave | Cleveland | 44106-1231 | 8/19/04 | |
| Debbie | | Foster | | 10915 Orville Ave | Cleveland | 44106-1244 | 8/19/04 | |
| Katy | | Foster | | 10915 Orville Ave | Cleveland | 44106-1256 | 8/19/04 | |
| Darlene | | Jones | | 10707 Lee Ave Apt 4 | Cleveland | 44106-1323 | 8/19/04 | |
| Tamiko | Y | Farris | | 1323 E 114th St | Cleveland | 44106-1408 | 8/19/04 | |
| Tina | T | Russell | | 1344 E 123rd St | Cleveland | 44106-1408 | 8/19/04 | |
| James | | Johnson | | 1364 E 123rd St | Cleveland | 44106-1408 | 8/19/04 | |
| James | | Splest | | 1364 E 123rd St | Cleveland | 44106-1408 | 8/19/04 | |
| Jonathan | | Mitz | | 1321 Lakeview Rd | Cleveland | 44106-1427 | 8/19/04 | |
| Damon | L | Beal | | 1477 E 116th St | Cleveland | 44106-1451 | 8/19/04 | |
| Lashawn | J | Harris | | 1390 Lakeview Rd | Cleveland | 44106-1470 | 8/19/04 | |
| Deant | P | Booker | | 1379 E 120th St | Cleveland | 44106-1477 | 8/19/04 | |
| Deonte | P | Booker | | 1379 E 120th St | Cleveland | 44106-1477 | 8/19/04 | |
| Lontar | C | Brock | | 1379 E 120th St 4 | Cleveland | 44106-1477 | 8/19/04 | |
| Diane | V | Smoot | | 11706 Beulah Ave | Cleveland | 44106-1480 | 8/19/04 | |

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|-----------|--------------|------------------------------|-------------------|------------|---------|
| Ronnie | Dean | 1673 E 90th St | Cleveland | 44106-1504 | 8/19/04 |
| Brent | A Fruge | 9001 Hough Ave | Cleveland | 44106-1506 | 8/19/04 |
| Veronica | P Mansion | 9231 Hough Ave 1 | Cleveland | 44106-1586 | 8/19/04 |
| Wyeaia | S Walter | 9410 Hough Ave | Cleveland | 44106-1599 | 8/19/04 |
| Andrew | L Dunn | 11021 East Blvd | Cleveland | 44106-1703 | 8/19/04 |
| Jason | A Yoh | 1906 E 120th St | Cleveland | 44106-1979 | 8/19/04 |
| Jimmy | P Mason | 1905 E 9th St | Cleveland | 44106-2007 | 8/19/04 |
| Gregory | Hooper | 1905 E 89th St | Cleveland | 44106-2007 | 8/19/04 |
| Alisha | D Lindsey | 1905 E 89th St | Cleveland | 44106-2007 | 8/19/04 |
| Aaron | E Brown | 1814 E 85th St | Cleveland | 44106-2014 | 8/19/04 |
| Chavaugan | D Copeland | 1819 E 86th St | Cleveland | 44106-2018 | 8/19/04 |
| Joseph | D James | 1859 E 86th St | Cleveland | 44106-2018 | 8/19/04 |
| Demetrius | G Johnson | 1831 E 87th St | Cleveland | 44106-2024 | 8/19/04 |
| Joy | A Gibbs | 1840 E 87th St | Cleveland | 44106-2025 | 8/19/04 |
| Charles | G Brown | 1835 E 93rd St | Cleveland | 44106-2050 | 8/19/04 |
| Ramon | D Hanson | 1871 E 93rd St | Cleveland | 44106-2050 | 8/19/04 |
| Regina | M Sims | 1847 E 87th St | Cleveland | 44106-2091 | 8/19/04 |
| Charles | Warner | 9813 Cedar Ave | Cleveland | 44106-2114 | 8/19/04 |
| Monique | L Giroux | 2549 Kenilworth Rd Apt 2 | Cleveland Heights | 44106-2473 | 8/19/04 |
| Malcom | S Wightman | 2759 Hampshire Rd Apt 4 | Cleveland Heights | 44106-2580 | 8/19/04 |
| Carly | C Blail | 2757 Euclid Heights Blvd Apt | Cleveland Heights | 44106-2839 | 8/19/04 |
| Michael | D Brown | 9306 Cedar Ave | Cleveland | 44106-2938 | 8/19/04 |
| Robert | T Dickson | 2043 E 86th St | Cleveland | 44106-2963 | 8/19/04 |
| Bryan | E Linkous | 2284 Grandview Ave | Cleveland | 44106-3142 | 8/19/04 |
| Naah | Israel | 2096 Surrey Rd Apt 3 | Cleveland Heights | 44106-3261 | 8/19/04 |
| Tony | V Taylor | 2214 E 89th St | Cleveland | 44106-3402 | 8/19/04 |
| Shayla | R Norwood | 2219 E 101st St | Cleveland | 44106-3579 | 8/19/04 |
| John | Roberts | 1689 E 85th St | Cleveland | 44106-3707 | 8/19/04 |
| Kermit | I Abrams | 1607 E 86th St | Cleveland | 44106-3713 | 8/19/04 |
| Bonnie | Hall | 8615 Wade Park Ave | Cleveland | 44106-3738 | 8/19/04 |
| Nick | J Michrovicz | 11435 Juniper Rd #420 | Cleveland | 44106-3976 | 8/20/04 |
| Sally | Wilson | 1485 East Blvd | Cleveland | 44106-4012 | 8/19/04 |
| Orlando | Gaston | 1487 East Blvd | Cleveland | 44106-4012 | 8/19/04 |
| Robert | L Hardnett | 1675 Ansel Rd Apt 922 | Cleveland | 44106-4172 | 8/19/04 |
| Laura | A Flynn | 10711 Arthur Ave | Cleveland | 44106-4213 | 8/19/04 |
| Johnnie | B Johnston | 10719 Arthur Ave | Cleveland | 44106-4213 | 8/19/04 |
| Laura | M Jones | 10710 Arthur Ave | Cleveland | 44106-4214 | 8/19/04 |

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|------------|--------------|----------------------------|-----------|------------|---------|--|
| Cassandra | Samms | 10801 Arthur Ave | Cleveland | 44106-4215 | 8/19/04 | |
| Matt | P Wald | 1720 E 116th Pl Apt 11 | Cleveland | 44106-4330 | 8/19/04 | |
| Byron | A Hitchcock | 1720 E 116th Pl | Cleveland | 44106-4331 | 8/19/04 | |
| Nicole | M Moore | 8717 Kenmore Ave | Cleveland | 44106-4509 | 8/19/04 | |
| Tenika | I Tucker | 8618 Meridian Ave | Cleveland | 44106-4515 | 8/19/04 | |
| Charles | Slapak | 2190 Ambleside Dr F6036 | Cleveland | 44106-4633 | 8/19/04 | |
| Michelle | Thomas | 9360 Amesbury Ave | Cleveland | 44106-4801 | 8/19/04 | |
| Cleius | L Williams | 1779 E 89th St Apt 3 | Cleveland | 44106-4808 | 8/19/04 | |
| William | D Philpott | 1838 E 90th St | Cleveland | 44106-4852 | 8/19/04 | |
| Traice | M Morris | 1832 E 90th St | Cleveland | 44106-4853 | 8/19/04 | |
| Emma | Williams | 1832 E 90th St | Cleveland | 44106-4853 | 8/19/04 | |
| Michael | J McCall | 1458 E 115th St | Cleveland | 44106-5301 | 8/19/04 | |
| Laonya | N Spencer | 1458 E 115th St Apt 5 | Cleveland | 44106-5302 | 8/19/04 | |
| Erin | M Shukart | 1964 E 126th St | Cleveland | 44106-5961 | 8/19/04 | |
| Angela | S Ricotta | 253 Beech St | Berea | 44107-1209 | 8/19/04 | |
| Raymond | Curry | 16101 Lake Ave | Lakewood | 44107-1247 | 8/19/04 | |
| Constance | T Ludrosky | 12505 Edgewater Dr Apt 106 | Lakewood | 44107-1632 | 8/19/04 | |
| Clarissa | L Perkins | 11820 Edgewater Dr Apt 510 | Lakewood | 44107-1793 | 8/19/04 | |
| Ann | G Heideneich | 11732 Lake Ave Apt 201 | Lakewood | 44107-2053 | 8/20/04 | |
| Eva | A Hunter | 1211 Granger Ave | Lakewood | 44107-2218 | 8/20/04 | |
| Nicole | S McVay | 1332 Webb Rd | Lakewood | 44107-2227 | 8/19/04 | |
| Fahmi | S Daoud | 14703 Clifton Blvd | Lakewood | 44107-2521 | 8/20/04 | |
| Douglas | Eisenbrown | 1317 Belle Ave | Lakewood | 44107-2679 | 8/20/04 | |
| Mark | D Perdue | 1352 Lakewood Ave 1 | Lakewood | 44107-2848 | 8/20/04 | |
| Katie | M Greene | 12816 Detroit Ave #1 | Lakewood | 44107-2854 | 8/19/04 | |
| Tabitha | A Priszano | 11840 S Lane Dr Apt 7 | Lakewood | 44107-2927 | 8/20/04 | |
| Eric | D Davis | 12410 Detroit Ave #2 | Lakewood | 44107-3013 | 8/19/04 | |
| Jeffrey | T Harris | 1340 W Clifton Blvd 00 | Lakewood | 44107-3364 | 8/19/04 | |
| Hallie | E Page | 1441 Rockway Ave | Lakewood | 44107-3418 | 8/20/04 | |
| Jean | M Pandoli | 1530 Mars Ave | Lakewood | 44107-3823 | 8/20/04 | |
| Jessica | L Berry | 14212 Cedarwood Ave UP | Lakewood | 44107-4547 | 8/19/04 | |
| Angela | D Raycheck | 1415 Wyandotte Ave 10 | Lakewood | 44107-4753 | 8/20/04 | |
| Bianca | Rivera | 1446 Ridgewood Ave | Lakewood | 44107-5015 | 8/19/04 | |
| Antoinette | L Battiste | 2104 Lark St #A | Lakewood | 44107-5298 | 8/20/04 | |
| Verdell | S Benfield | 2014 Morrison Ave Apt 3 | Lakewood | 44107-5748 | 8/20/04 | |
| Dana | Sisk | 2020 Warren Rd | Lakewood | 44107-5841 | 8/19/04 | |
| Jeffrey | E Cechura | 2040 Richland Ave | Lakewood | 44107-6002 | 8/20/04 | |

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| Dominique | M | Remnick | | 2011 Buns Rd 16 | Lakewood | 44107-6101 | 8/20/04 | |
| Tiano | A | Dozier | | 1631 Newman Ave Apt 1 | Lakewood | 44107-7202 | 8/20/04 | |
| Joshenna | | Johnson | | 625 E 99th St | Cleveland | 44108-1213 | 8/20/04 | |
| Gregory | E | Simmons | | 681 E 99th St | Cleveland | 44108-1213 | 8/20/04 | |
| Khaniedra | E | Ferguson | | 723 E 99th St | Cleveland | 44108-1215 | 8/20/04 | |
| Mike | A | Johnson | | 1332 W 93rd St | Cleveland | 44108-1226 | 8/20/04 | |
| Joshua | M | Lynch | | 710 E 91st St | Cleveland | 44108-1235 | 8/19/04 | |
| Darnell | M | Means | | 762 E 92nd St | Cleveland | 44108-1239 | 8/19/04 | |
| Marvin | | Tuistrone | | 619 E 94th St | Cleveland | 44108-1244 | 8/20/04 | |
| Wyndell | J | Jordan | | 688 E 96th St | Cleveland | 44108-1265 | 8/20/04 | |
| Angela | D | Shaw | | 9005 Stewart Ave Apt 1 | Cleveland | 44108-1295 | 8/19/04 | |
| Quinchette | L | Wade | | 10521 Glenville Ave UP | Cleveland | 44108-1315 | 8/20/04 | |
| Lucretina | D | McCalister | | 668 E 101st St | Cleveland | 44108-1323 | 8/20/04 | |
| Rasheem | K | James | | 672 E 101st St | Cleveland | 44108-1323 | 8/20/04 | |
| Daymion | J | Smith | | 692 E 101st St | Cleveland | 44108-1323 | 8/20/04 | |
| Suyin | A | Foster | | 692 E 101st St | Cleveland | 44108-1323 | 8/20/04 | |
| Daimonta | P | Washington | | 648 E 102nd St | Cleveland | 44108-1327 | 8/19/04 | |
| Ariel | J | Wynn | | 10320 Barrett Ave | Cleveland | 44108-1362 | 8/20/04 | |
| Michael | | Wilson | | 586 E 105th St Apt 4 | Cleveland | 44108-1363 | 8/19/04 | |
| Mike | | Dawson | | 569 E 102nd St | Cleveland | 44108-1370 | 8/19/04 | |
| Michael | | Dawson | | 569 E 102nd St | Cleveland | 44108-1370 | 8/20/04 | |
| Terry | L | Hall | | 593 E 101st St | Cleveland | 44108-1372 | 8/19/04 | |
| Tyrone | L | Barboza | | 634 E 102nd St | Cleveland | 44108-1382 | 8/19/04 | |
| Lamar | J | Edwards | | 643 E 101st St | Cleveland | 44108-1384 | 8/20/04 | |
| Mario | J | Edwards | | 643 E 101st St Apt 1 | Cleveland | 44108-1384 | 8/19/04 | |
| Mario | D | Cole | | 643 E 101st St Apt 1 | Cleveland | 44108-1384 | 8/20/04 | |
| Gabrielle | M | Carter | | 527 E 110th St | Cleveland | 44108-1402 | 8/19/04 | |
| Deidre | M | Conley | | 556 E 110th St | Cleveland | 44108-1403 | 8/19/04 | |
| Eva | B | Harris | | 576 E 110th St | Cleveland | 44108-1403 | 8/19/04 | |
| Derrick | B | Dunnican | | 527 E 117th St | Cleveland | 44108-1417 | 8/19/04 | |
| Monic | C | Jones | | 425 E 114th St | Cleveland | 44108-1422 | 8/19/04 | |
| Paul | A | Nesbitt | Jr | 11202 Sellers Ave | Cleveland | 44108-1426 | 8/19/04 | |
| L.C. | | Bass | | 541 E 108th St | Cleveland | 44108-1435 | 8/19/04 | |
| Taria | S | Thompson | | 430 E 114th St UP | Cleveland | 44108-1470 | 8/19/04 | |
| Tony | P | Johnson | Jr | 561 E 114th St | Cleveland | 44108-1473 | 8/19/04 | |
| George | | Hunter | | 468 E 117th St | Cleveland | 44108-1479 | 8/19/04 | |
| Nichelle | V | Shelton | | 565 E 117th St | Cleveland | 44108-1481 | 8/19/04 | |

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| Marchant | O | Smith | 597 E 107th St | Cleveland | 44108-1489 | 8/19/04 | |
| Tamara | L | Hughes | 597 E 107th St | Cleveland | 44108-1489 | 8/19/04 | |
| Allen | P | Smith | 11708 Ablewhite Ave | Cleveland | 44108-1507 | 8/19/04 | |
| Trent | A | Gainer | 11607 Shadeland Ave | Cleveland | 44108-1546 | 8/19/04 | |
| David | A | Williams | 12012 Shadeland Ave | Cleveland | 44108-1554 | 8/19/04 | |
| Dequins | M | Dowdell | 336 Eddy Rd Apt 9 | Cleveland | 44108-1638 | 8/19/04 | |
| Jonathan | J | Carter | 353 E 123rd St UP | Cleveland | 44108-1701 | 8/19/04 | |
| Jamson | D | Jones | 363 E 123rd St | Cleveland | 44108-1701 | 8/19/04 | |
| Michael | J | Durroh | 351 E 124th St | Cleveland | 44108-1705 | 8/19/04 | |
| Tony | Q | Harden | 12424 Iowa Ave | Cleveland | 44108-1721 | 8/20/04 | |
| Pamela | | Hines | 12504 Locke Ave | Cleveland | 44108-1735 | 8/19/04 | |
| Denyia | R | Gordon | 12613 Locke Ave | Cleveland | 44108-1736 | 8/19/04 | |
| Tonya | | Pruitt | 430 Arbor Rd | Cleveland | 44108-1759 | 8/19/04 | |
| Steven | | Toby | 430 Arbor Rd | Cleveland | 44108-1759 | 8/19/04 | |
| Anita | | Pruitt | 430 Arbor Rd | Cleveland | 44108-1759 | 8/19/04 | |
| Rayshaw | O | Watson | 480 Cleveland Rd | Cleveland | 44108-1771 | 8/19/04 | |
| Floyd | J | Smith | 444 Cleveland Rd | Cleveland | 44108-1772 | 8/19/04 | |
| Tomiko | D | Tanke | 12504 Lancelot Ave | Cleveland | 44108-1827 | 8/19/04 | |
| Tamara | L | Ricker | 12602 Lancelot Ave | Cleveland | 44108-1829 | 8/19/04 | |
| Shayna | L | Willis | 12525 Vashi Ave | Cleveland | 44108-1832 | 8/19/04 | |
| Eric | I | Stanley | 13008 Austin Ave | Cleveland | 44108-2025 | 8/20/04 | |
| Victoria | E | Schmitt | 12714 Shaw Ave | Cleveland | 44108-2049 | 8/19/04 | |
| John | A | Denison | 771 E 102nd St | Cleveland | 44108-2237 | 8/20/04 | |
| herman | | Ciers | 652 E 106th St | Cleveland | 44108-2242 | 8/20/04 | |
| David | | Kennedy | 1234 Eddy Rd 1 | Cleveland | 44108-2308 | 8/19/04 | |
| King | G | Lawson | 941 Thornhill Dr | Cleveland | 44108-2315 | 8/19/04 | |
| Gregory | V | Yates | 654 E 115th St | Cleveland | 44108-2319 | 8/19/04 | |
| Shawn | S | Jackson | 589 E 120th St 4 | Cleveland | 44108-2347 | 8/19/04 | |
| Janie | | Stephens | 638 E 120th St UO | Cleveland | 44108-2348 | 8/19/04 | |
| Jason | | Delarge | 980 Eddy Rd | Cleveland | 44108-2360 | 8/19/04 | |
| Darnell | L | Harrison | 965 Eddy Rd UP | Cleveland | 44108-2361 | 8/19/04 | |
| Derek | G | Dorsey | 873 Thornhill Dr | Cleveland | 44108-2363 | 8/19/04 | |
| Yuset | L | Jones | 875 Thornhill Dr | Cleveland | 44108-2363 | 8/19/04 | |
| Mary | | Walker | 879 Eddy Rd | Cleveland | 44108-2381 | 8/19/04 | |
| Jerome | K | Simmons | 12716 Woodside Ave | Cleveland | 44108-2427 | 8/20/04 | |
| Chad | S | Brown | 640 E 125th St | Cleveland | 44108-2432 | 8/20/04 | |
| David | | Wheeler | 615 E 128th St | Cleveland | 44108-2445 | 8/20/04 | |

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| Robert | I | Clifford | 625 E 128th St Apt 3 | Cleveland | 44108-2445 | 8/20/04 | |
| Mike | S | Burton | 12643 Edmonton Ave | Cleveland | 44108-2515 | 8/19/04 | |
| Kristal | | Johnson | 12622 Edmonton Ave | Cleveland | 44108-2516 | 8/19/04 | |
| Mario | D | Rogers | 12827 Woodside Ave | Cleveland | 44108-2532 | 8/20/04 | |
| Robert | E | Olekson | 962 E 129th St | Cleveland | 44108-2540 | 8/20/04 | |
| Tony | B | Michel | 12634 Irvington Ave | Cleveland | 44108-2563 | 8/20/04 | |
| Derrick | P | Mayweather | 11415 Hopkins Ave | Cleveland | 44108-2629 | 8/20/04 | |
| Robert | | Gardard | 11602 Hopkins Ave | Cleveland | 44108-2634 | 8/20/04 | |
| John | | Renfree | 860 Lakeview Rd | Cleveland | 44108-2650 | 8/20/04 | |
| Steve | D | Peebles | 11208 Hopkins Ave | Cleveland | 44108-2675 | 8/20/04 | |
| Laura | | Garrett | 810 Parkwood Dr | Cleveland | 44108-2700 | 8/20/04 | |
| Dow | M | Dial | 10520 Bryant St | Cleveland | 44108-2704 | 8/19/04 | |
| Donna | R | Davis | 10801 Garfield Ave Up | Cleveland | 44108-2733 | 8/20/04 | |
| Michael | L | Johnson | 10602 Kimberley Ave | Cleveland | 44108-2740 | 8/20/04 | |
| Sade | E | Jackson | 9012 Kempton Ave | Cleveland | 44108-2933 | 8/19/04 | |
| Robin | | Thomas | 10201 Kempton Ave | Cleveland | 44108-2956 | 8/19/04 | |
| Marcus | | Wilson | 10539 Earle Ave | Cleveland | 44108-3019 | 8/20/04 | |
| Shawn | | Madison | 10562 Earle Ave 1 | Cleveland | 44108-3020 | 8/19/04 | |
| Dante | L | Richmond | 11707 Fairport Ave | Cleveland | 44108-3113 | 8/20/04 | |
| Roxie | D | Black | 12100 Ohlman Ave Apt 5 | Cleveland | 44108-3128 | 8/19/04 | |
| Rosella | | Dumas | 11401 Ohlman Ave | Cleveland | 44108-3131 | 8/20/04 | |
| Michael | W | Larry | 11617 Ohlman Ave | Cleveland | 44108-3135 | 8/19/04 | |
| Lemarcus | D | Roberson | 11618 Ohlman Ave | Cleveland | 44108-3136 | 8/19/04 | |
| Martha | A | Dixon | 11601 Tuscora Ave | Cleveland | 44108-3155 | 8/19/04 | |
| Antoine | C | Whitsett | 11606 Tuscora Ave | Cleveland | 44108-3156 | 8/19/04 | |
| Jaeon | D | Johnson | 11805 Tuscora Ave | Cleveland | 44108-3159 | 8/20/04 | |
| Ezra | | Lever | 10200 Adams Rd | Cleveland | 44108-3213 | 8/19/04 | |
| Julie | S | Johnson | 9304 Adams Ave | Cleveland | 44108-3221 | 8/20/04 | |
| Ann | M | Edwards | 9601 Adams Ave | Cleveland | 44108-3226 | 8/20/04 | |
| Shaunta | | Curt | 9708 Adams Ave | Cleveland | 44108-3229 | 8/20/04 | |
| Timothy | E | Williams | 1249 E 89th St Apt 1 | Cleveland | 44108-3361 | 8/20/04 | |
| Ronnie | L | Hill | 10010 Ostend Ave | Cleveland | 44108-3404 | 8/20/04 | |
| Andre | | Green | 10002 Somerset Ave #12 | Cleveland | 44108-3416 | 8/20/04 | |
| Eric | | Canon | 10223 Somerset Ave DN | Cleveland | 44108-3419 | 8/20/04 | |
| Noah | | Bloch | 10409 Somerset Ave | Cleveland | 44108-3423 | 8/20/04 | |
| Sharand | | Franks | 9822 North Blvd | Cleveland | 44108-3428 | 8/19/04 | |
| Charisse | C | Charles | 10235 South Blvd #N-11 | Cleveland | 44108-3447 | 8/19/04 | |

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| Jim | L | Lindsay | 1273 E 100th St | Cleveland | 44108-3502 | 8/19/04 | |
| Jacqueline | D | Manley | 1245 E 102nd St DN | Cleveland | 44108-3506 | 8/19/04 | |
| Aaron | | Clark | 10729 Hathaway Ave | Cleveland | 44108-3515 | 8/19/04 | |
| Antwaun | | Jones | 10702 Olivet Ave | Cleveland | 44108-3526 | 8/19/04 | |
| Roy | J | Johnson | 1236 E 105th St | Cleveland | 44108-3668 | 8/19/04 | |
| Wilbro | B | Hamilton | 1265 Parkwood Dr | Cleveland | 44108-3616 | 8/19/04 | |
| Meggien | R | Davis | 10921 Grantwood Ave | Cleveland | 44108-3626 | 8/19/04 | |
| Joanna | L | Berry | 10916 Grantwood Ave | Cleveland | 44108-3627 | 8/19/04 | |
| Brandon | C | Murray | 10936 Grantwood Ave | Cleveland | 44108-3627 | 8/19/04 | |
| Willie | A | Gardner | 10933 Hampden Ave | Cleveland | 44108-3636 | 8/19/04 | |
| Marissa | | King | 10800 Tacoma Ave | Cleveland | 44108-3644 | 8/19/04 | |
| Veneccia | T | Bruister | 10905 Pasadena Ave | Cleveland | 44108-3665 | 8/19/04 | |
| Timothy | | Hill | 11123 ADA Ave | Cleveland | 44108-3716 | 8/19/04 | |
| Tia | | Shone | 11127 ADA Ave | Cleveland | 44108-3716 | 8/19/04 | |
| Eddie | J | Lewis | 11110 ADA Ave | Cleveland | 44108-3717 | 8/19/04 | |
| Erwin | | Hayes | 1107 E 111th St | Cleveland | 44108-3728 | 8/19/04 | |
| Daniel | J | Woods | 1113 E 111th St | Cleveland | 44108-3728 | 8/19/04 | |
| Brian | W | Vaughn | 1255 E 112th St | Cleveland | 44108-3735 | 8/19/04 | |
| Brian | | Vaughn | 1255 E 112th St | Cleveland | 44108-3735 | 8/19/04 | |
| Brian | | Vaughn | 1255 E 112th St #40 | Cleveland | 44108-3735 | 8/19/04 | |
| Aaron | J | Scriven | 1258 E 112th St | Cleveland | 44108-3736 | 8/19/04 | |
| Edward | L | Hood | 1250 E 114th St | Cleveland | 44108-3747 | 8/19/04 | |
| Jermaine | | Stone | 1025 Linn Dr Apt 5 | Cleveland | 44108-3767 | 8/19/04 | |
| Aaron | | Wemics | 1084 E 123rd St | Cleveland | 44108-3864 | 8/19/04 | |
| India | J | George | 12337 Tuscora Ave | Cleveland | 44108-3865 | 8/19/04 | |
| Jose | | Jackson | 1046 Lakeview Rd | Cleveland | 44108-3900 | 8/19/04 | |
| Teralynn | | Norman | 1046 Lakeview Rd | Cleveland | 44108-3900 | 8/19/04 | |
| Andrew | W | Price | 1243 E 123rd St 6 | Cleveland | 44108-4001 | 8/20/04 | |
| Rogar | L | Simmons | 12009 Osceola Ave | Cleveland | 44108-4025 | 8/19/04 | |
| Robert | | Bates | 12106 Phillips Ave | Cleveland | 44108-4040 | 8/19/04 | |
| Tracey | L | Ohara | 1139 Lakeview Rd | Cleveland | 44108-4053 | 8/19/04 | |
| Tanisha | N | Davis | 1231 E 124th St Apt 2 | Cleveland | 44108-4081 | 8/19/04 | |
| Crystal | M | Wakefield | 660 E 99th St Apt 2 | Cleveland | 44108-4105 | 8/20/04 | |
| Meariah | M | Thornon | 797 E 90th St | Cleveland | 44108-4127 | 8/20/04 | |
| Charles | D | Barnett | 613 E 120th St | Cleveland | 44108-4203 | 8/19/04 | |
| Mario | J | Benson | 625 E 117th St | Cleveland | 44108-4204 | 8/19/04 | |
| Melissa | L | Care | 3152 W 41st St | Cleveland | 44109-1274 | 8/19/04 | |

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| Melvin | | Martinez | | 1643 Holmden Ave | Cleveland | 44109-1724 | 8/19/04 | |
| Meleva | | Carr | | 3121 Woodridge Ave | Cleveland | 44109-2175 | 8/19/04 | |
| Clifton | C | Mosby | | 2711 Riverside Ave | Cleveland | 44109-2321 | 8/19/04 | |
| Ronald | | Crable | | 4406 Denison Ave | Cleveland | 44109-2609 | 8/19/04 | |
| Randall | A | Harmon | | 3512 Hentize Ave | Cleveland | 44109-3242 | 8/19/04 | |
| Gilbert | | Henderson | | 4239 W 24th St Rear | Cleveland | 44109-3301 | 8/19/04 | |
| Gilbert | R | Henderson | | 4239 W 24th St Rear | Cleveland | 44109-3301 | 8/19/04 | |
| Yvonne | | Scott | | 16700 Lake Shore Blvd | Cleveland | 44110-1071 | 8/19/04 | |
| Carly | L | Dew | | 15448 Lake Shore Blvd | Cleveland | 44110-1121 | 8/19/04 | |
| Robert | | McQueen | | 16001 Euclid Beach Blvd Apt 14 | Cleveland | 44110-1127 | 8/19/04 | |
| Clark | S | Bryson | | 123 E 156th St | Cleveland | 44110-1181 | 8/19/04 | |
| Robert | | Lewis | | 125 E 156th St | Cleveland | 44110-1182 | 8/19/04 | |
| Daya | F | Wright | | 285 E 150th St | Cleveland | 44110-1210 | 8/19/04 | |
| Don | | Caldwell | | 15612 Grovewood Ave | Cleveland | 44110-1404 | 8/19/04 | |
| April | | Clark | | 1240 E 170th St | Cleveland | 44110-1541 | 8/19/04 | |
| Yvonne | | Clark | | 1240 E 170th St | Cleveland | 44110-1541 | 8/20/04 | |
| Eric | A | Payne | | 1256 E 170th St | Cleveland | 44110-1572 | 8/19/04 | |
| Rochelle | | Day | | 446 E 157th St | Cleveland | 44110-1648 | 8/19/04 | |
| Clarence | | Ladson | Sr | 13823 Lake Shore Blvd | Cleveland | 44110-1923 | 8/19/04 | |
| Jennavee | | Madison | | 13906 Lake Shore Blvd | Cleveland | 44110-1931 | 8/19/04 | |
| Maurice | I | Davis | | 13304 Eaglesmere Ave | Cleveland | 44110-2138 | 8/19/04 | |
| Harold | J | Hammer | | 13585 Earlwood Rd | Cleveland | 44110-2222 | 8/19/04 | |
| Carthia | A | Rider-Suggs | | 775 E 152nd St | Cleveland | 44110-2304 | 8/19/04 | |
| Mark | K | Sheline | | 775 E 152nd St S-10 | Cleveland | 44110-2304 | 8/19/04 | |
| Ernest | | Smith | | 17041 Saint Clair Ave | Cleveland | 44110-2528 | 8/19/04 | |
| Arabia | | Fitzgerald | | 19230 Nottingham Rd | Cleveland | 44110-2724 | 8/19/04 | |
| Charisse | L | Berry | | 16024 Saint Clair Ave | Cleveland | 44110-3027 | 8/19/04 | |
| Lamar | | Williams | | 786 London Rd 2 | Cleveland | 44110-3112 | 8/19/04 | |
| Michael | | Wilmore | | 1014 Ivanhoe Rd #2 | Cleveland | 44110-3207 | 8/19/04 | |
| Michael | | Wilmore | | 1014 Ivanhoe Rd #2 | Cleveland | 44110-3207 | 8/19/04 | |
| Roxanne | Y | Tewksbury | | 15630 Halliday Ave | Cleveland | 44110-3239 | 8/19/04 | |
| Damian | | Taylor | | 13623 Glenside Rd | Cleveland | 44110-3523 | 8/19/04 | |
| Alvin | L | Martin | | 13654 Saint Clair Ave | Cleveland | 44110-3547 | 8/19/04 | |
| Albert | M | Brown | | 904 E 146th St | Cleveland | 44110-3704 | 8/19/04 | |
| Alonzo | | Ford | | 827 E 147th St | Cleveland | 44110-3721 | 8/19/04 | |
| Anthony | | Harris | | 1637 Ansel Rd | Cleveland | 44110-4104 | 8/19/04 | |
| Melvin | J | Smith | | 10418 Almira Ave | Cleveland | 44111-1209 | 8/19/04 | |

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|-----------|--------------|----|--------------------------|----------------|------------|---------|--|
| Ricky | Wilkenson | | 10212 Loreta Ave | Cleveland | 44111-1260 | 8/19/04 | |
| Gabriel | O Linton | | 14424 Birchwood Ave | Cleveland | 44111-1312 | 8/19/04 | |
| Michelle | L Vaught | | 3317 W 119th St | Cleveland | 44111-1760 | 8/19/04 | |
| Nashon | S Hamilton | | 3081 W 105th St | Cleveland | 44111-1843 | 8/19/04 | |
| Ruben | J Rodriguez | | 3419 W 135th St | Cleveland | 44111-2405 | 8/19/04 | |
| Lanise | M Penn | | 3284 W 129th St | Cleveland | 44111-2501 | 8/19/04 | |
| Lara | D Wells | | 12123 Trskett Rd UP | Cleveland | 44111-2549 | 8/19/04 | |
| Beatrice | R Bennett | | 10229 Bernard Ave | Cleveland | 44111-2802 | 8/19/04 | |
| Derek | Smith | | 10909 Joan Ave | Cleveland | 44111-2813 | 8/19/04 | |
| Kurt | P Neubauer | | 3275 W 110th St | Cleveland | 44111-2825 | 8/19/04 | |
| Art | Knight | | 3865 W 118th St | Cleveland | 44111-3007 | 8/19/04 | |
| Roberta | Allen | | 3625 W 147th St Apt 307 | Cleveland | 44111-3182 | 8/19/04 | |
| Kathlyn | Calliens | | 3459 W 117th St | Cleveland | 44111-3520 | 8/19/04 | |
| Maria | Hernandez | | 3484 W 120th St | Cleveland | 44111-3536 | 8/19/04 | |
| David | A Smith | | 12027 Lorain Ave | Cleveland | 44111-3568 | 8/19/04 | |
| Sylvester | Harris | | 11316 Headley Ave UP | Cleveland | 44111-3630 | 8/19/04 | |
| Rhonda | Ferguson | | 3487 W 100th St | Cleveland | 44111-3841 | 8/19/04 | |
| Chris | Keffer | | 3515 W 105th St | Cleveland | 44111-3858 | 8/19/04 | |
| Noah | K Monroe | | 3500 W 125th St | Cleveland | 44111-3859 | 8/19/04 | |
| Jacob | L Evand | | 3673 West Blvd | Cleveland | 44111-3859 | 8/19/04 | |
| Carmen | Savarino | | 3579 W 105th St | Cleveland | 44111-3879 | 8/19/04 | |
| Samuel | Santiago | | 12205 Brighton Ave | Cleveland | 44111-4529 | 8/19/04 | |
| Sonia | M Gonzalez | | 11839 Brighton Ave | Cleveland | 44111-4639 | 8/19/04 | |
| James | P Munial | | 11301 Saint Mark Ave | Cleveland | 44111-4761 | 8/19/04 | |
| George | J Rich | | 3865 W 116th St | Cleveland | 44111-5214 | 8/19/04 | |
| Deangelo | E Thomas | | 16321 Lorain Ave Apt 409 | Cleveland | 44111-5548 | 8/19/04 | |
| Muhammah | Hafiz | | 3634 Bosworth Rd | Cleveland | 44111-6000 | 8/19/04 | |
| Henry | R Johnson | | 3640 Bosworth Rd 24 | Cleveland | 44111-6004 | 8/19/04 | |
| Julio | E Cordero | Jr | 3664 Bosworth Rd | Cleveland | 44111-6011 | 8/19/04 | |
| Phillip | A Batie | | 3670 Bosworth Rd | Cleveland | 44111-6013 | 8/19/04 | |
| Ashlee | C Earmon | | 18140 Euclid Ave | Cleveland | 44112-1089 | 8/19/04 | |
| Kirby | M Wilcox | | 1855 Cliffview Rd | Cleveland | 44112-1114 | 8/19/04 | |
| Joshua | W Huddleston | | 1881 Noble Rd Apt 1 | East Cleveland | 44112-1664 | 8/19/04 | |
| Victoria | T Lewis | | 15600 Terrace Rd Apt 311 | East Cleveland | 44112-2047 | 8/19/04 | |
| Noelia | Velazquez | | 15600 Terrace Rd Apt 702 | East Cleveland | 44112-2049 | 8/19/04 | |
| Dunc | G Shepherd | | 15632 Euclid Ave | East Cleveland | 44112-2065 | 8/19/04 | |
| Bernard | Wilson | | 15632 Euclid Ave | East Cleveland | 44112-2065 | 8/19/04 | |

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| Denitz | | Johnson | 1710 Lakefront Ave | East Cleveland | 44112-2123 | 8/19/04 | |
| Calvin | | Richardson | 1710 Lakefront Ave | East Cleveland | 44112-2133 | 8/19/04 | |
| Vincent | A | Heishell | 15999 Nelamere Rd | East Cleveland | 44112-2209 | 8/19/04 | |
| Talisha | C | Hall | 1284 E 133rd St U/P | East Cleveland | 44112-2402 | 8/19/04 | |
| Janet | P | Roberts | 1370 E 134th St | East Cleveland | 44112-2453 | 8/19/04 | |
| Rico | | Sanchez | 1352 E 143rd St | East Cleveland | 44112-2540 | 8/19/04 | |
| Mark | M | Taylor | 1315 Coit Ave | East Cleveland | 44112-2653 | 8/19/04 | |
| Sharon | | Miner | 1335 Elwood Rd | East Cleveland | 44112-2701 | 8/19/04 | |
| John | L | Biller | 1770 Shaw Ave | East Cleveland | 44112-2813 | 8/19/04 | |
| Adolfo | X | Llanot | 1849 Taylor Rd | East Cleveland | 44112-2846 | 8/19/04 | |
| Pha | C | Mason | 1724 Taylor Rd | East Cleveland | 44112-2888 | 8/19/04 | |
| Ternie | A | Jackson | 1565 W 29th St 4 | Cleveland | 44112-2906 | 8/19/04 | |
| Mary | | Johnson | 13507 5th Ave | East Cleveland | 44112-3105 | 8/19/04 | |
| Daniel | | Whitfield | 14600 Euclid Ave | East Cleveland | 44112-3451 | 8/19/04 | |
| Keith | | Fleming | 1885 Windemere St | East Cleveland | 44112-3903 | 8/19/04 | |
| Jason | | Dixon | 1889 Windemere St | East Cleveland | 44112-3903 | 8/19/04 | |
| Jamille | | West | 1810 Beersford Rd Apt 2 | East Cleveland | 44112-3994 | 8/19/04 | |
| Kathleen | A | Dugan | 12808 Phillips Ave | East Cleveland | 44112-4112 | 8/19/04 | |
| Tashara | M | Barkley | 1204 Melbourne Rd | East Cleveland | 44112-4137 | 8/19/04 | |
| Charles | C | Collins | 1988 Hayden Ave | East Cleveland | 44112-4139 | 8/20/04 | |
| Larry | | Harris | 1175 Rozelle Ave | East Cleveland | 44112-4141 | 8/19/04 | |
| Lakeshea | R | Thomas | 1188 Rozelle Ave | East Cleveland | 44112-4142 | 8/19/04 | |
| Joseph | | Smith | 1191 E 125th St | East Cleveland | 44112-4165 | 8/19/04 | |
| Alvin | | Head | 1724 Hartshorn Rd Apt 3 | East Cleveland | 44112-4262 | 8/19/04 | |
| Angels | C | Clark | 1716 Hartshorn Rd Apt 1 | East Cleveland | 44112-4264 | 8/19/04 | |
| Ronald | L | Reynolds | 1875 Forest Hills Blvd Apt C6 | East Cleveland | 44112-4351 | 8/19/04 | |
| David | L | Stanely | 13800 Terrace Rd | East Cleveland | 44112-4357 | 8/19/04 | |
| Tony | | Thomas | 1755 Carlyon Rd | East Cleveland | 44112-4403 | 8/19/04 | |
| Keith | | Black | 1726 E 133rd St Apt 203 | East Cleveland | 44112-4846 | 8/19/04 | |
| David | P | Kistler | 1278 W 9th St | Cleveland | 44113-1028 | 8/19/04 | |
| Christopher | C | Clinton | 1300 W 9th St | Cleveland | 44113-1031 | 8/19/04 | |
| Cedric | D | Beckett | 1300 W 9th St | Cleveland | 44113-1031 | 8/19/04 | |
| Lindsay | B | Lombardy | 1300 W 9th St | Cleveland | 44113-1031 | 8/19/04 | |
| Lonnie | | Issac | 1300 W 9th St | Cleveland | 44113-1031 | 8/19/04 | |
| Enik | S | Lodermeier | 1300 W 9th St | Cleveland | 44113-1031 | 8/19/04 | |
| David | W | Dulabon | 1300 W 9th St | Cleveland | 44113-1031 | 8/19/04 | |
| Ricky | | Bishop | 1299 W 25th St 301 | Cleveland | 44113-1101 | 8/19/04 | |

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| Robert | A | Wilson | Jr | 2600 Loop Dr | Cleveland | 44113-1122 | 8/19/04 | |
| Mtume | | Bel | | 1280 Spruce Ct | Cleveland | 44113-1136 | 8/19/04 | |
| Larry | | Wells | | 1295 Spruce Ct | Cleveland | 44113-1143 | 8/19/04 | |
| Teron | | Kelly | | 2550 Loop Dr | Cleveland | 44113-1197 | 8/19/04 | |
| Antwon | I | Jackson | | 976 W Saint Clair Ave | Cleveland | 44113-1211 | 8/19/04 | |
| Boris | | Grinberg | | 955 W Saint Clair Ave | Cleveland | 44113-1233 | 8/19/04 | |
| Frank | J | Valassades | | 955 W Saint Clair Ave | Cleveland | 44113-1233 | 8/19/04 | |
| Kristopher | L | Green | | 955 W Saint Clair Ave | Cleveland | 44113-1233 | 8/19/04 | |
| Alfred | A | Moore | | 710 W Saint Clair Ave | Cleveland | 44113-1247 | 8/19/04 | |
| Nasser | | Moiduddin | | 740 W Superior Ave | Cleveland | 44113-1804 | 8/19/04 | |
| Robert | D | Hoff | | 2249 Elm Ave | Cleveland | 44113-2320 | 8/19/04 | |
| Danail | | Hriston | | 2249 Elm Ave | Cleveland | 44113-2320 | 8/19/04 | |
| Ronald | W | Davidson | | 1854 Scranton Rd | Cleveland | 44113-2434 | 8/19/04 | |
| Saunil | K | Shah | | 1500 Detroit Ave | Cleveland | 44113-2444 | 8/19/04 | apartments per yahoo |
| Samantha | L | Farlow | | 1500 Detroit Ave | Cleveland | 44113-2444 | 8/19/04 | apartments per yahoo |
| Rebecca | | Feist | | 1500 Detroit Ave | Cleveland | 44113-2444 | 8/19/04 | apartments per yahoo |
| Lisa | J | Molinaro | | 1500 Detroit Ave | Cleveland | 44113-2444 | 8/19/04 | apartments per yahoo |
| Donie | | Thomas | | 2648 Division Ave | Cleveland | 44113-2603 | 8/19/04 | |
| Kamille | T | Young | | 2738 Division Ave | Cleveland | 44113-2608 | 8/19/04 | |
| Sharunde | M | Simesl | | 2621 Division Ave | Cleveland | 44113-2615 | 8/19/04 | |
| Heather | E | Anderson | | 2705 Division Ave Apt 570 | Cleveland | 44113-2619 | 8/19/04 | |
| Daniel | S | Walker | | 2700 Wasington Ave | Cleveland | 44113-2640 | 8/19/04 | |
| Michael | J | Key | | 2700 Wasington Ave | Cleveland | 44113-2640 | 8/19/04 | |
| Gregory | R | Gray | | 2616 Division Ave Apt 462 | Cleveland | 44113-2659 | 8/19/04 | |
| Adam | J | Mitchell | | 2558 Division Ave | Cleveland | 44113-2667 | 8/19/04 | |
| Vincent | C | Marconi | | 2860 Detroit Ave | Cleveland | 44113-2711 | 8/19/04 | |
| Jeff | L | Palmer | | 2849 Detroit Ave | Cleveland | 44113-2733 | 8/19/04 | |
| Jeffrey | | Barnes | | 2515 Jay Ave | Cleveland | 44113-3033 | 8/19/04 | |
| Jennifer | | Marrano | | 1512 W 25th St | Cleveland | 44113-3104 | 8/19/04 | |
| William | L | Sayle | | 1745 W 25th St | Cleveland | 44113-3109 | 8/19/04 | residential-several owners per Nexis |
| Deborah | A | Leonard | | 1745 W 25th St | Cleveland | 44113-3109 | 8/19/04 | residential-several owners per Nexis |
| Chuckie | S | Whetzel | | 1745 W 25th St | Cleveland | 44113-3109 | 8/19/04 | residential-several owners per Nexis |
| Rubin | J | Szerlip | | 1745 W 25th St | Cleveland | 44113-3109 | 8/19/04 | residential-several owners per Nexis |
| Raymond | | Alexander | | 1745 W 25th St | Cleveland | 44113-3109 | 8/19/04 | residential-several owners per Nexis |
| Jewel | T | Henderson | | 1745 W 25th St | Cleveland | 44113-3109 | 8/19/04 | residential-several owners per Nexis |
| Carolyn | E | Peoples | | 1745 W 25th St | Cleveland | 44113-3109 | 8/19/04 | residential-several owners per Nexis |
| Jacqueline | | Diaz | | 1745 W 25th St | Cleveland | 44113-3109 | 8/19/04 | residential-several owners per Nexis |

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| Willie | E Williams | 1745 W 25th St | Cleveland | 44113-3109 | 8/19/04 | residential-several owners per Nexis |
| Carlton | L James | 1745 W 25th St | Cleveland | 44113-3109 | 8/19/04 | residential-several owners per Nexis |
| Anna | M Young | 1745 W 25th St 9015 | Cleveland | 44113-3109 | 8/19/04 | residential-several owners per Nexis |
| Juan | R River | 1795 W 25th St | Cleveland | 44113-3112 | 8/19/04 | per internet search this is Care Alliance a low income health f |
| George | Johnson | 1795 W 25th St | Cleveland | 44113-3112 | 8/19/04 | per internet search this is Care Alliance a low income health f |
| Tony | A Bussey | 1795 W 25th St | Cleveland | 44113-3112 | 8/19/04 | per internet search this is Care Alliance a low income health f |
| Kelvin | N Young | 1795 W 25th St | Cleveland | 44113-3112 | 8/19/04 | per internet search this is Care Alliance a low income health f |
| Tito | Cruz | 1795 W 25th St | Cleveland | 44113-3112 | 8/19/04 | per internet search this is Care Alliance a low income health f |
| Malik | Wallyudin | 1795 W 25th St | Cleveland | 44113-3112 | 8/19/04 | per internet search this is Care Alliance a low income health f |
| John | Walham | 1795 W 25th St 1004 | Cleveland | 44113-3112 | 8/19/04 | per internet search this is Care Alliance a low income health f |
| Mary | Miles | 1795 W 25th St 1009 | Cleveland | 44113-3112 | 8/19/04 | per internet search this is Care Alliance a low income health f |
| Gregory | Reever | 1795 W 25th St 1015 | Cleveland | 44113-3112 | 8/19/04 | per internet search this is Care Alliance a low income health f |
| Angerila | Woodard | 4115 Whitman Ave UP | Cleveland | 44113-3236 | 8/19/04 | residential per County Auditor |
| Timothy | E Opus | 3926 Bridge Ave | Cleveland | 44113-3316 | 8/19/04 | on yahoo maps only |
| Kathryn | L Francis | 1951 W 25th St | Cleveland | 44113-3418 | 8/19/04 | residential-several owners per Nexis |
| Alethia | A Collins | 2051 W 19th St UP | Cleveland | 44113-3548 | 8/19/04 | residential-several owners per Nexis |
| Robert | E Bierce | 2000 Scranton Rd 5013 | Cleveland | 44113-3554 | 8/19/04 | residential-several owners per Nexis |
| Kouita | S Borders | 2098 W 11th St | Cleveland | 44113-3654 | 8/19/04 | on yahoo maps only |
| Michael | L Clark | 2085 W 10th St | Cleveland | 44113-3658 | 8/19/04 | on yahoo maps only |
| Mirian | Torres | 2142 W 10th St | Cleveland | 44113-3659 | 8/19/04 | on yahoo maps only |
| Jewel | Rogers | 3225 Lorain Ave | Cleveland | 44113-3701 | 8/19/04 | on yahoo maps only |
| Ron | H Fredrick | 3200 Lorain Ave | Cleveland | 44113-3702 | 8/19/04 | residential per Nexis |
| Mark | Stevenson | 3536 Lorain Ave | Cleveland | 44113-3704 | 8/19/04 | on yahoo maps only |
| Marvin | L Raum | 2160 W 40th Pl 2 | Cleveland | 44113-3845 | 8/19/04 | residential per Nexis |
| Frances | Torres | 2237 W 33rd St | Cleveland | 44113-3905 | 8/19/04 | on yahoo maps only |
| Duice | M Barrientos | 2117 W 33rd Pl | Cleveland | 44113-3907 | 8/19/04 | residential per County Auditor |
| Ida | Wilhelmina | 3200 Monroe Ave | Cleveland | 44113-3950 | 8/19/04 | residential per County Auditor |
| Marta | Lopez | 2117 W 31st St | Cleveland | 44113-4015 | 8/19/04 | on yahoo maps only |
| Desmond | Greer | 2207 W 30th St | Cleveland | 44113-4049 | 8/19/04 | on yahoo maps only |
| Corrie | A Minor | 2128 W 19th St Apt 3 | Cleveland | 44113-4274 | 8/19/04 | residential-several owners per Nexis |
| Kiesha | M Triple | 2461 W 11th St | Cleveland | 44113-4401 | 8/19/04 | on yahoo maps only |
| Jose | Russel | 1210 Kenilworth Ave | Cleveland | 44113-4417 | 8/19/04 | yahoo maps only looks like either a park or a hospital |
| Mary | Smith | 2504 W 7th St 12 | Cleveland | 44113-4508 | 8/19/04 | residential per Nexis |
| Karen | Pierre | 2516 W 7th St | Cleveland | 44113-4508 | 8/19/04 | on yahoo maps only |
| Tianna | S Watt | 2531 W 6th Pl #D | Cleveland | 44113-4528 | 8/19/04 | on yahoo maps only |
| Michael | C Harston | 2585 W 5th St Apt C | Cleveland | 44113-4563 | 8/19/04 | residential-several owners per Nexis |
| Jammie | E Glover | 2567 W 5th St | Cleveland | 44113-4565 | 8/19/04 | residential-several owners per Nexis |

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| Robert | L | Abernathy | 2559 W 5th St | Cleveland | 44113-4566 | 8/20/04 | residential-several owners per Nexis |
| Thomas | C | Hopper | 2559 W 5th St 2 | Cleveland | 44113-4566 | 8/19/04 | residential-several owners per Nexis |
| Rosolyn | R | Carter | 2551 W 5th St Apt H | Cleveland | 44113-4567 | 8/19/04 | |
| Cory | W | Reese | 2541 W 5th St | Cleveland | 44113-4568 | 8/19/04 | |
| Kenya | L | Myers | 2529 W 5th St Apt J | Cleveland | 44113-4570 | 8/19/04 | |
| Maleke | D | Middlebrooks | 2521 W 5th St | Cleveland | 44113-4571 | 8/19/04 | |
| Ron | | Sims | 2503 W 5th St Apt A | Cleveland | 44113-4573 | 8/19/04 | |
| Charles | D | Vanhorn | 2503 W 5th St Apt F | Cleveland | 44113-4573 | 8/19/04 | |
| Andre | | Thompson | 2521 W 6th St | Cleveland | 44113-4575 | 8/19/04 | |
| Mustalia | Z | Jefferson | 2565 W 7th St Apt D | Cleveland | 44113-4584 | 8/19/04 | |
| Chris | | Jones | 2525 W 7th St | Cleveland | 44113-4587 | 8/19/04 | |
| John | | Walsh | 2792 W 32nd St | Cleveland | 44113-4706 | 8/19/04 | |
| Kimberly | | Wade | 2558 W 25th St #501 | Cleveland | 44113-4707 | 8/19/04 | |
| Al | D | James | 2576 W 25th St 4 | Cleveland | 44113-4707 | 8/19/04 | |
| Donell | | Edmond | 2609 W 25th St | Cleveland | 44113-4708 | 8/19/04 | |
| Magally | | Rodriguez | 3014 Barber Ave | Cleveland | 44113-4731 | 8/19/04 | |
| Jimmy | | Oa | 2730 W 30th St | Cleveland | 44113-4753 | 8/19/04 | |
| Latoza | L | Wilson | 2998 W 38th St | Cleveland | 44113-4804 | 8/19/04 | |
| Dionne | L | Forpahl | 3426 Seymour Ave | Cleveland | 44113-4924 | 8/19/04 | |
| John | D | Sartler | 3444 Walton Ave | Cleveland | 44113-4929 | 8/19/04 | |
| Sarina | | Williams | 3038 Walton Ave | Cleveland | 44113-5040 | 8/19/04 | |
| Charra | | Marellis | 3104 Walton Ave | Cleveland | 44113-5040 | 8/19/04 | |
| Jose | | Rodeza | 1458 W 25th St 4 | Cleveland | 44113-5102 | 8/19/04 | |
| Erik | N | Gonzalez | 3040 W 14th St | Cleveland | 44113-5255 | 8/19/04 | |
| Jennifer | A | Knickle | 1211 W 9th St | Cleveland | 44113-5500 | 8/19/04 | |
| Eddie | I | Shelton | 2102 Lakeside Ave | Cleveland | 44114-1126 | 8/19/04 | |
| Walter | | Perry | 522 Superior Ave 302 | Cleveland | 44114-1215 | 8/19/04 | |
| Major | L | Riggins | 1380 E 13th St | Cleveland | 44114-1807 | 8/20/04 | |
| Reba | L | Cloud | 1040 Saint Clair Ave NE | Cleveland | 44114-1825 | 8/19/04 | |
| Markeisha | B | Johnson | 1543 Saint Clair Ave NE | Cleveland | 44114-2003 | 8/19/04 | |
| Freddie | | Stackhouse | 1838 Superior Ave | Cleveland | 44114-2108 | 8/19/04 | |
| Pamela | M | Shorter | 1850 Superior Ave | Cleveland | 44114-2130 | 8/19/04 | |
| Barbara | C | Johnson | 1873 Superior Ave | Cleveland | 44114-2134 | 8/19/04 | |
| John | | Rivers | 1512 E 19th St Apt 25B | Cleveland | 44114-2135 | 8/19/04 | |
| Dyon | J | Law | 151 E 19th St | Cleveland | 44114-2138 | 8/19/04 | |
| Janice | D | Daniels | 1512 E 19th St #24-B | Cleveland | 44114-2138 | 8/19/04 | |
| Ebonv | L | Rice | 275 Euclid Ave #14 | Cleveland | 44114-2205 | 8/19/04 | |

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|-----------|--------------|-------------------------|-----------|------------|---------|--|
| Dannone | K Thompson | 1012 Superior Ave | Cleveland | 44114-2515 | 8/19/04 | |
| Stacy | M Hopskin | 1484 Superior Ave | Cleveland | 44114-2904 | 8/19/04 | |
| Kimbrogh | D Lavis | 1525 Superior Ave | Cleveland | 44114-2905 | 8/19/04 | |
| Danny | Johnson | 1512 Superior Ave 3E | Cleveland | 44114-2906 | 8/19/04 | |
| Vaughn | R McCline | 1736 Payne Ave | Cleveland | 44114-2910 | 8/19/04 | |
| Gregory | H Neilson | 1701 E 12th St | Cleveland | 44114-3236 | 8/19/04 | |
| Brendan | P Sweeney | 1701 E 12th St | Cleveland | 44114-3236 | 8/19/04 | |
| Dennis | W Jarecke | 1701 E 12th St | Cleveland | 44114-3236 | 8/19/04 | |
| Marco | S Martello | 1701 E 12th St | Cleveland | 44114-3236 | 8/19/04 | |
| Jessie | M Foltz | 1701 E 12th St 206 W | Cleveland | 44114-3236 | 8/19/04 | |
| Ramon | J Milane | 1801 E 12th St | Cleveland | 44114-3500 | 8/19/04 | |
| Eric | D Rose | 3439 Superior Ave | Cleveland | 44114-4124 | 8/19/04 | |
| Michael | I Moss | 3439 Superior Ave 306-E | Cleveland | 44114-4124 | 8/19/04 | |
| Willie | M Williams | 2900 Superior Ave | Cleveland | 44114-4202 | 8/19/04 | |
| Michale | L Rogers | 3642 Payne Ave | Cleveland | 44114-4316 | 8/19/04 | |
| David | T Crumby | 1260 Prospect Ave 501 | Cleveland | 44115-1210 | 8/19/04 | |
| Bennie | C Anthony Jr | 1017 Prospect Ave 803 | Cleveland | 44115-1226 | 8/19/04 | |
| Joseph | M Rutledge | 1127 Euclid Ave | Cleveland | 44115-1601 | 8/19/04 | |
| Warren | F Clayton | 1127 Euclid Ave | Cleveland | 44115-1601 | 8/19/04 | |
| Robert | T Hill | 1127 Euclid Ave | Cleveland | 44115-1601 | 8/19/04 | |
| Kishann | R Corchery | 1540 Euclid Ave 428 | Cleveland | 44115-2103 | 8/19/04 | |
| Robert | F David | 1793 Euclid Ave | Cleveland | 44115-2105 | 8/19/04 | |
| William | H Seng | 2130 Euclid Ave | Cleveland | 44115-2215 | 8/19/04 | |
| Karel | A Smith | 2130 Euclid Ave | Cleveland | 44115-2215 | 8/19/04 | |
| Alyssa | M Bender | 2130 Euclid Ave | Cleveland | 44115-2215 | 8/19/04 | |
| Lawana | M Anderson | 2130 Euclid Ave | Cleveland | 44115-2215 | 8/19/04 | |
| Christy | A Lewis | 2130 Euclid Ave | Cleveland | 44115-2215 | 8/19/04 | |
| John | R Seng | 2130 Euclid Ave #91 | Cleveland | 44115-2215 | 8/19/04 | |
| Michelle | S Fowler | 2741 Euclid Ave 12 | Cleveland | 44115-2411 | 8/19/04 | |
| Dominique | L Lone | 2757 Euclid Ave 7 | Cleveland | 44115-2411 | 8/19/04 | |
| David | I Williams | 2961 Euclid Ave | Cleveland | 44115-2415 | 8/19/04 | |
| Karina | D Cooper | 3259 Euclid Ave | Cleveland | 44115-2509 | 8/19/04 | |
| Nona | M Smith | 1066 Carnegie Ave | Cleveland | 44115-2804 | 8/19/04 | |
| Kimberly | A Wilson | 2219 E 22nd St | Cleveland | 44115-2914 | 8/19/04 | |
| Willie | S Jackson | 2606 Cedar Ave 2 | Cleveland | 44115-2943 | 8/19/04 | |
| Freddie | Johnson | 2198 E 37th St | Cleveland | 44115-3009 | 8/19/04 | |
| Terrica | A Hunter | 2336 E 30th St | Cleveland | 44115-3051 | 8/19/04 | |

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|-----------|---|-----------|------------------------------|-------------------|------------|---------|--|
| Sylvester | M | Jordan | 2256 Community College Ave | Cleveland | 44115-3116 | 8/19/04 | |
| Mitchell | J | Grant | 2436 E 36th St | Cleveland | 44115-3714 | 8/19/04 | |
| David | | Davis | 19217 Euclid Ave 204 | Euclid | 44117-1323 | 8/19/04 | |
| Dwain | K | McGhee | 19201 Euclid Ave Apt 102 | Euclid | 44117-1360 | 8/19/04 | |
| Baby | | Evans | 1500 E 191st St 508A | Euclid | 44117-1398 | 8/19/04 | |
| Aje | J | Holt | 20769 Euclid Ave C 406 | Euclid | 44117-1522 | 8/19/04 | |
| Crystal | B | Sutton | 22140 Euclid Ave Apt 410 | Euclid | 44117-1614 | 8/19/04 | |
| Kim | K | Leonadd | 22133 Euclid Ave | Euclid | 44117-1650 | 8/19/04 | |
| Steven | | Walter | 22141 Euclid Ave #223 | Euclid | 44117-1650 | 8/19/04 | |
| Larry | L | Howard | 22143 Euclid Ave | Euclid | 44117-1650 | 8/19/04 | |
| Brittany | N | Gordon | 22191 Euclid Ave 211 | Euclid | 44117-1650 | 8/19/04 | |
| Jim | I | Kenneth | 22114 Euclid Ave | Euclid | 44117-1651 | 8/19/04 | |
| Mika | E | Hayes | 24034 Euclid Ave | Euclid | 44117-1726 | 8/19/04 | |
| Larry | I | Smith | 25450 Glenbrook Blvd | Euclid | 44117-1820 | 8/19/04 | |
| Richard | | Harris | 25454 Euclid Ave 7 | Euclid | 44117-2642 | 8/19/04 | |
| Demon | M | Johnson | 1542 Coventry Rd | East Cleveland | 44118-1013 | 8/19/04 | |
| Michael | | Freeman | 14029 Superior Rd | East Cleveland | 44118-1029 | 8/19/04 | |
| Tiffany | | Walker | 14015 Superior Rd | East Cleveland | 44118-1082 | 8/19/04 | |
| Thonnie | | Tate | 14015 Superior Rd | East Cleveland | 44118-1082 | 8/19/04 | |
| Elbony | L | Edwards | 14015 Superior Rd | East Cleveland | 44118-1082 | 8/19/04 | |
| Robert | G | Knirsch | 1646 Belmar Rd | Cleveland Heights | 44118-1156 | 8/19/04 | |
| Cory | S | Johnson | 1349 Forest Hills Blvd 4 | Cleveland | 44118-1367 | 8/19/04 | |
| Chimere | | Turner | 1867 S Taylor Rd | Cleveland Heights | 44118-2161 | 8/19/04 | |
| Seth | L | Jones | 3069 E Derbyshire Rd | Cleveland Heights | 44118-2726 | 8/19/04 | |
| Ramon | L | Finnell | 3118 Kensington Rd | Cleveland Heights | 44118-3542 | 8/19/04 | |
| Ray | | Harris | 3158 Kensington Rd | Cleveland Heights | 44118-3542 | 8/19/04 | |
| William | C | Kumfolo | 2582 Queenston Rd | Cleveland Heights | 44118-4352 | 8/19/04 | |
| Robert | A | Schneider | 332 E 200th St | Euclid | 44119-1104 | 8/19/04 | |
| Stephanie | M | Muzila | 17825 Lake Shore Blvd Apt 10 | Cleveland | 44119-1226 | 8/20/04 | |
| Tasha | | Scott | 18207 Lanken Ave | Cleveland | 44119-3213 | 8/19/04 | |
| Delores | | Scott | 18207 Lanken Ave | Cleveland | 44119-3213 | 8/19/04 | |
| Rodney | | Scott | 18207 Lanken Ave | Cleveland | 44119-3213 | 8/19/04 | |
| Khalidiah | | Bryan | 16955 Shaker Blvd #120 | Lakewood | 44120-1631 | 8/20/04 | |
| Gregory | L | Glover | 2819 E 116th St | Cleveland | 44120-2146 | 8/19/04 | |
| Charles | | Schommel | 2856 S Moreland Blvd | Cleveland | 44120-2317 | 8/20/04 | |
| Laure | J | Jacobs | 2856 S Moreland Blvd #28 | Cleveland | 44120-2317 | 8/20/04 | |
| Denice | L | Pratt | 2858 S Moreland Blvd | Cleveland | 44120-2317 | 8/20/04 | |

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|------------|-------------|----|-----------------------------|----------------------|------------|---------|--|
| Joe | Bead | | 2920 E 118th St | Cleveland | 44120-2604 | 8/19/04 | |
| Leah | Love | | 11828 Honeydale Ave 8 | Cleveland | 44120-2636 | 8/18/04 | |
| Christel | N Johnson | | 2931 E 128th St | Cleveland | 44120-2667 | 8/20/04 | |
| William | E Bacor | Jr | 12800 Signet Ave | Cleveland | 44120-3173 | 8/19/04 | |
| Richard | Johnson | | 3578 E 139th St | Cleveland | 44120-4571 | 8/19/04 | |
| Alfonzo | D Russell | | 3541 E 146th St | Cleveland | 44120-4828 | 8/20/04 | |
| Rebecca | M Mynatt | | 3646 Menlo Rd | Shaker Heights | 44120-5057 | 8/19/04 | |
| Kriste | Nowuck | | 7825 Joyce Dr | Parma | 44120-7150 | 8/20/04 | |
| Krista | Nowuck | | 7835 Joyce Dr | Parma | 44120-7150 | 8/20/04 | |
| Eric | Jone | | 2011 Green Rd UP | Cleveland | 44121-1109 | 8/20/04 | |
| James | M Daniels | | 2057 Green Rd | Cleveland | 44121-1109 | 8/19/04 | |
| Jasmine | A Hardy | | 2360 Greenvale Rd | Cleveland | 44121-1115 | 8/19/04 | |
| Lea | A Johnson | | 2008 Cliffview Rd | Cleveland | 44121-1262 | 8/19/04 | |
| Charles | Williams | | 1325 Yellowstone Rd | Cleveland Heights | 44121-1510 | 8/19/04 | |
| William | Clark | | 3519 Radcliff Rd | Cleveland Heights | 44121-1547 | 8/19/04 | |
| John | J Johnson | Jr | 1633 Wood Rd | Cleveland | 44121-1743 | 8/20/04 | |
| Eddy | J Jackson | | 3739 Mayfield Rd Apr 202 | Cleveland | 44121-1751 | 8/20/04 | |
| Jayne | A Prak | | 1480 Crest Rd Apt 3 | Cleveland | 44121-1769 | 8/20/04 | |
| Michael | P Watts | | 1120 Cleveland Heights Blvd | Cleveland Heights | 44121-1822 | 8/19/04 | |
| Thomas | Miller | | 863 Beverly Rd | Cleveland Heights | 44121-2003 | 8/19/04 | |
| Cherrie | N Allen | | 887 Englewood Rd | Cleveland Heights | 44121-2041 | 8/19/04 | |
| Regina | Stewart | | 2486 Noble Rd #7-21 | Cleveland Heights | 44121-2132 | 8/19/04 | |
| Wagoria | Thompson | | 1310 Avondale Rd | South Euclid | 44121-2528 | 8/20/04 | |
| Matthew | T Berkowitz | | 1113 Arbonne Rd | South Euclid | 44121-2914 | 8/20/04 | |
| Lamarkus | D Brown | | 1015 Pierrmont Rd | South Euclid | 44121-2934 | 8/19/04 | |
| Anita | Brasmon | | 2246 S Green Rd | Cleveland | 44121-3324 | 8/20/04 | |
| Walter | D Spencer | | 4746 Burger Rd | South Euclid | 44121-3831 | 8/19/04 | |
| Aron | K Grenberg | | 23302 E Baintree Rd | Beachwood | 44122-1246 | 8/19/04 | |
| Harry | D Schnur | | 46 Lyman Cir | Shaker Heights | 44122-2119 | 8/19/04 | |
| Raymond | G Daley | | 19115 Shaker Blvd | Shaker Heights | 44122-2545 | 8/19/04 | |
| Tawonne | L Hendking | | 27600 Chagrin Blvd Ste 176 | Woodmere | 44122-4421 | 8/19/04 | |
| Kenv | Walker | | 19224 Scottsdale Blvd | Shaker Heights | 44122-6418 | 8/19/04 | |
| Acquanetta | D Wells | | 3885 E 188th St | Cleveland | 44122-6562 | 8/19/04 | |
| Robert | Herman | | 19411 Harvard Ave | Warrensville Heights | 44122-6818 | 8/19/04 | |
| Tanya | J Mitchell | | 19456 Brookfield Ln | Warrensville Heights | 44122-7029 | 8/19/04 | |
| James | A Freedman | | 24101 Lake Shore Blvd | Euclid | 44123-1225 | 8/19/04 | |
| Walter | E Neij | | 24101 Lake Shore Blvd | Euclid | 44123-1225 | 8/19/04 | |

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| Shankie | D Lewis | | 24455 Lake Shore Blvd Apt 713 | Euclid | 44123-1253 | 8/19/04 | |
| Ambre | R Moss | | 24451 Lake Shore Blvd Apt 91 | Euclid | 44123-1254 | 8/19/04 | |
| Jesse | E Bodnarik | | 24101 Lake Shore Blvd Apt 701 | Euclid | 44123-1268 | 8/19/04 | |
| Stephanie | R Paulk | | 24455 Lake Shore Blvd E-810 | Euclid | 44123-1273 | 8/20/04 | |
| Bryan | C Perry | | 861 E 232nd St | Euclid | 44123-2511 | 8/19/04 | |
| Renirc | E Jackson | | 24101 Lake Shore Blvd Apt 901 | Euclid | 44123-4211 | 8/19/04 | |
| Mackie | A Dieng | | 24801 Lake Shore Blvd Apt 901 | Euclid | 44123-4232 | 8/19/04 | |
| John | L Derrico | Jr | 397 E 222nd St Apt B24 | Euclid | 44123-4701 | 8/19/04 | |
| Herschel | L Crawford | | 6310 Adair Dr | Brook Park | 4412-3805 | 8/19/04 | |
| Donna | Smith | | 4657 Warner Rd Apt 2 | Garfield Heights | 44125-1217 | 8/19/04 | |
| Karla | Harrett | | 4651 Warner Rd 03 | Garfield Heights | 44125-1256 | 8/20/04 | |
| Joshua | A Lieberum | | 10009 Plymouth Ave | Garfield Heights | 44125-2518 | 8/19/04 | |
| Gregory | D Lubecki | | 12024 Granger Rd | Garfield Heights | 44125-2935 | 8/19/04 | |
| Donald | Williams | | 5269 E 126th St | Garfield Heights | 44125-3022 | 8/19/04 | |
| Ashley | Everett | | 5269 E 126th St | Garfield Heights | 44125-3022 | 8/19/04 | |
| Danielle | S Coleman | | 5269 E 126th St Apt 202 | Garfield Heights | 44125-3022 | 8/19/04 | |
| Fanny | Taghiarini | | 12404 Darlington Ave | Garfield Heights | 44125-3751 | 8/19/04 | |
| Eric | R Desimone | | 12328 Woodward Blvd | Garfield Heights | 44125-3811 | 8/19/04 | |
| Tyronne | J Taylor | | 13709 Eastwood Blvd | Garfield Heights | 44125-3918 | 8/19/04 | |
| Tiore | L Brubaker | | 5747 Turney Rd | Garfield Heights | 44125-4065 | 8/19/04 | |
| Monica | M Brown | | 4932 E 141st St 302-B | Garfield Heights | 44125-5058 | 8/19/04 | |
| Steven | M Bauch | | 13312 Rockside Rd | Garfield Heights | 44125-5168 | 8/19/04 | |
| John | L Daltorio | | 10007 Parkview Ave DN | Garfield Heights | 44125-6304 | 8/19/04 | |
| Maria | Klippel | | 22000 Westwood Rd | Fairview Park | 44126-1002 | 8/19/04 | |
| Anne | C Lupson | | 4209 W 223rd St | Fairview Park | 44126-1019 | 8/19/04 | |
| Helga | K Folta | | 21477 Mastick Rd | Fairview Park | 44126-3050 | 8/19/04 | |
| Isela | Vega | | 3166 E 49th St | Cleveland | 44127-1050 | 8/19/04 | |
| Richard | J Thompson | | 4511 Lester Ave | Cleveland | 44127-1163 | 8/19/04 | |
| Sena | M Benefield | | 4960 Broadway Ave | Cleveland | 44127-1169 | 8/19/04 | |
| Terri | Green | | 3467 E 53rd St | Cleveland | 44127-1653 | 8/20/04 | |
| Keaine | D Johnson | | 5786 Portage Ave | Cleveland | 44127-1710 | 8/20/04 | |
| Renee | E Bartos | | 5889 Cable Ave | Cleveland | 44127-1724 | 8/20/04 | |
| Lawrence | L Formby | | 5801 Portage Ave | Cleveland | 44127-1739 | 8/20/04 | |
| Vincent | L Johnson | | 3311 E 65th St | Cleveland | 44127-1902 | 8/19/04 | |
| Thomas | Anthony | | 3395 E 70th St | Cleveland | 44127-2002 | 8/19/04 | |
| Stewart | Graham | | 3411 E 70th St | Cleveland | 44127-2004 | 8/19/04 | |
| Joe | S Casalicchio | | 3468 E 70th St | Cleveland | 44127-2005 | 8/19/04 | |

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| George | E | Mynatt | | 3449 E 69th St | Cleveland | 44127-2035 | 8/19/04 | |
| David | P | Thompson | | 3768 E 142nd St | Cleveland | 44128-1007 | 8/19/04 | |
| Marcus | A | Randle | | 3794 E 143rd St | Cleveland | 44128-1011 | 8/19/04 | |
| Michael | Blue | | | 3842 E 144th St | Cleveland | 44128-1017 | 8/19/04 | |
| Ebony | M | Jefferson | | 14415 Edgewood Ave | Cleveland | 44128-1051 | 8/19/04 | |
| Darnell | D | Jackson | | 14120 Glendale Ave | Cleveland | 44128-1066 | 8/19/04 | |
| Olivia | E | Lyons | | 3859 E 149th St | Cleveland | 44128-1103 | 8/19/04 | |
| Robert | | Howard | | 3775 E 154th St | Cleveland | 44128-1113 | 8/20/04 | |
| Dericka | V | Gale | | 3817 E 154th St 4 | Cleveland | 44128-1115 | 8/19/04 | |
| Terri | A | Smith | | 3996 E 148th St | Cleveland | 44128-1151 | 8/19/04 | |
| Crystal | L | McCurry | | 3940 E 153rd St | Cleveland | 44128-1167 | 8/19/04 | |
| James | C | William | Jr | 15609 Walden Ave | Cleveland | 44128-1246 | 8/20/04 | |
| Tony | | Myron | | 16306 Throckley Ave | Cleveland | 44128-1376 | 8/20/04 | |
| James | L | Hunt | | 17316 Stockbridge Ave | Cleveland | 44128-1727 | 8/20/04 | |
| Ramons | D | Lewis | | 4131 E 142nd St | Cleveland | 44128-1811 | 8/20/04 | |
| Wydel | J | Jordan | | 4115 E 145rd St | Cleveland | 44128-1817 | 8/20/04 | |
| Thomas | M | Schervish | | 4067 E 146th St | Cleveland | 44128-1825 | 8/20/04 | |
| John | D | Jones | | 4401 E 142nd St | Cleveland | 44128-2307 | 8/20/04 | |
| Jonathan | E | Smith | | 14118 Miles Ave | Cleveland | 44128-2329 | 8/19/04 | |
| Zephary | | Williams | | 4345 Lee Rd | Cleveland | 44128-2400 | 8/19/04 | |
| Ronald | C | Favors | | 4305 E 164th St | Cleveland | 44128-2411 | 8/19/04 | |
| Jeremy | L | Smith | | 4380 E 154th St 2 | Cleveland | 44128-2907 | 8/19/04 | |
| Cleatrice | | Copeland | | 4477 E 154th St | Cleveland | 44128-2908 | 8/19/04 | |
| Charlie | | Baltimore | | 4394 E 156th St | Cleveland | 44128-2911 | 8/19/04 | |
| Timothy | | Perry | | 15974 Seville Rd | Cleveland | 44128-3067 | 8/19/04 | |
| Jayson | K | Bolden | | 16802 Palda Dr | Cleveland | 44128-3329 | 8/19/04 | |
| Mary | | Hudson | | 17822 Miles Rd | Warrensville Heights | 44128-3431 | 8/19/04 | |
| Phillip | J | Barker | | 16913 Langly Ave | Cleveland | 44128-3609 | 8/19/04 | |
| James | | Braxton | | 16742 Glenpak Ave | Cleveland | 44128-3666 | 8/19/04 | |
| Anthony | | Johnson | | 16215 Bryce Ave | Cleveland | 44128-3701 | 8/19/04 | |
| Vashon | R | Kellom | | 17225 Tarkington Ave | Cleveland | 44128-3725 | 8/20/04 | |
| Adida | A | Stokes | | 4317 Northfield d | Warrensville Heights | 44128-4666 | 8/19/04 | |
| Sandy | | Welch | | 4421 Granada Blvd 1 | Warrensville Heights | 44128-4823 | 8/20/04 | |
| Darren | S | Shirley | | 4862 Walford Rd Apt 16 | Warrensville Heights | 44128-5108 | 8/20/04 | |
| David | B | Peoples | | 4793 Walford Rd | Warrensville Heights | 44128-5125 | 8/19/04 | |
| William | | Stewart | | 4958 Caroline Dr | Warrensville Heights | 44128-5300 | 8/19/04 | |
| Monica | T | Bowman | | 23755 Banbury Cir | Warrensville Heights | 44128-5308 | 8/19/04 | |

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| Glen | Mack | | 4901 Banbury Cr | Warrensville Heights | 44128-5332 | 8/20/04 | |
| Robert | L Robinson | | 4925 Banbury Cr | Warrensville Heights | 44128-5340 | 8/19/04 | |
| Chauncy | L McDowell | | 4680 Country Ln | Warrensville Heights | 44128-5813 | 8/19/04 | |
| Jimmie | N Lassiter | | 4680 Country Ln | Warrensville Heights | 44128-5813 | 8/19/04 | |
| Cordell | S Dixon | | 4681 Country Ln NA | Warrensville Heights | 44128-5859 | 8/19/04 | |
| Richie | Huffman | III | 4731 Country Ln | Warrensville Heights | 44128-5862 | 8/19/04 | |
| Janita | A Davis | | 4756 Country Ln | Warrensville Heights | 44128-5865 | 8/19/04 | |
| Abraham | I Hutchinson | | 1800 Country Ln | Warrensville Heights | 44128-5868 | 8/19/04 | |
| Mattie | L Leverett | | 4800 Country Ln | Warrensville Heights | 44128-5868 | 8/19/04 | |
| Anibel | S Bracetta | | 4800 Country Ln | Warrensville Heights | 44128-5868 | 8/20/04 | |
| Shalaina | J Gooden | | 4421 Granada Blvd Apt 421 | Warrensville Heights | 44128-6002 | 8/19/04 | |
| Tyrone | Rembert | | 4490 Granada Blvd Apt 14 | Warrensville Heights | 44128-6016 | 8/19/04 | |
| Central | D Chappell | | 4480 Granada Blvd | Warrensville Heights | 44128-6032 | 8/19/04 | |
| Thelma | I Perkins | | 4460 Granada Blvd | Warrensville Heights | 44128-6033 | 8/19/04 | |
| Horace | J Sanders | III | 4470 Granada Blvd | Warrensville Heights | 44128-6034 | 8/19/04 | |
| Ryan | C Valenievick | | 5230 Knollwood Dr Apt 4 | Parma | 44129-1010 | 8/20/04 | |
| Roberta | K Mundorff | | 5267 Knollwood Dr | Parma | 44129-1023 | 8/19/04 | |
| John | J Piruta | | 5346 Knollwood Dr Apt 4 | Parma | 44129-1613 | 8/19/04 | |
| Marther | I Gibson | | 5439 Knollwood Dr Apt 2 | Parma | 44129-1651 | 8/19/04 | |
| Bryan | C Hurlless | | 5692 Alber Ave | Parma | 44129-3329 | 8/19/04 | |
| Frank | Jamson | | 8201 Thornton Dr | Parma | 44129-3900 | 8/20/04 | |
| Charles | R Mokey | Sr | 6169 Ridge Rd Apt 3 | Parma | 44129-4483 | 8/19/04 | |
| Steven | L Blekelv | | 5703 Sunderland Dr | Parma | 44129-4723 | 8/19/04 | |
| George | J Wederisch | | 6400 W 564th St | Parma | 44129-5238 | 8/19/04 | |
| Clemmontee | Colton | | 6841 Day Dr NA | Parma | 44129-5452 | 8/19/04 | |
| Dana | West | | 8290 Stratford Dr | Parma | 44129-5510 | 8/19/04 | |
| Phillips | I Epps | | 9631 Elsmere Dr | Parma | 44130-1626 | 8/19/04 | |
| Mike | M Jones | | 6242 Mariana Dr | Parma Heights | 44130-2836 | 8/19/04 | |
| Deborah | Troicky | | 6395 Old York Rd | Parma Heights | 44130-3023 | 8/19/04 | |
| Rhiane | G Ring | | 6395 Princeton Ct NA | Parma Heights | 44130-4001 | 8/19/04 | |
| Will | A Norris | II | 6923 York Rd | Parma Heights | 44130-4549 | 8/19/04 | |
| Jean | Martinez | | 9235 N Church Dr Apt 301 | Parma Heights | 44130-4708 | 8/19/04 | |
| Christopher | I Salate | | 15040 W Sprague Rd Apt J13 | Middleburg Heights | 44130-6990 | 8/19/04 | |
| John | Newman | | 9840 Pleasant Lake Blvd | Parma | 44130-7441 | 8/19/04 | |
| Michael | G Grakauskas | | 10277 S Lake Blvd | Parma | 44130-7557 | 8/19/04 | |
| Terrance | D Thornton | Sr | 10724 W Sprague Rd | Parma | 44130-7709 | 8/19/04 | |
| Caroline | Audrey | | 7073 W 150th St | Parma Heights | 44130-7825 | 8/19/04 | |

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| Susan | D | Stoisavljevic | | 7071 W 130th St Apt 231H | Parma Heights | 44130-7911 | 8/19/04 | |
| Christopher | P | Stapf | | 6745 Engle Rd | Middleburg Heights | 44130-7993 | 8/19/04 | |
| Dale | M | Glovich | | 5671 Chevrolet Blvd Apt 5 | Parma | 44130-8715 | 8/19/04 | |
| Natalie | C | Phillips | | 7842 Normandie Blvd | Middleburg Heights | 44130-8814 | 8/19/04 | |
| Andrew | M | Nagy | | 11360 Cheyenne Trl 6 | Parma Heights | 44130-9019 | 8/19/04 | |
| Scott | J | Novak | | 102 E Schaaf Rd | Brooklyn Heights | 44131-1208 | 8/19/04 | |
| Jason | M | Snider | | 1020 E Schaaf Rd | Brooklyn Heights | 44131-1222 | 8/19/04 | |
| Katie | A | Farris | | 6353 Gale Dr | Seven Hills | 44131-3126 | 8/19/04 | |
| Najwa | F | Tabbae | | 6434 Chestnut Rd | Independence | 44131-3311 | 8/19/04 | |
| Roger | | Willio | | 2917 Shady Ln | Seven Hills | 44131-4333 | 8/19/04 | |
| Ellen | F | Mueller | | 7810 Hillside Rd | Independence | 44131-5406 | 8/19/04 | |
| Monica | C | Kirkland | | 364 E Pleasant Valley Rd | Seven Hills | 44131-5606 | 8/19/04 | |
| Meissa | S | Cametatta | | 7420 Brookside Rd | Independence | 44131-6423 | 8/19/04 | |
| Damika | A | Turnage | | 26241 Lake Shore Blvd Apt 56 | Euclid | 44132-1141 | 8/19/04 | |
| Ebony | T | Coolesey | | 26151 Lake Shore Blvd Apt 151 | Euclid | 44132-1157 | 8/19/04 | |
| James | D | Montgomery | | 26940 Sidney Dr | Euclid | 44132-2902 | 8/19/04 | |
| Jasmine | R | Haverigne | | 26980 Sidney Dr | Euclid | 44132-2953 | 8/19/04 | |
| Michael | A | Jackson | | 1251 E 279th St | Euclid | 44132-3068 | 8/19/04 | |
| Elizabeth | M | Heath | | 1310 E 279th St 1 | Euclid | 44132-3073 | 8/19/04 | |
| Donte | M | Conard | | 27750 Sidney Dr | Euclid | 44132-3095 | 8/19/04 | |
| Jasmine | A | Stillwagon | | 27750 Sidney Dr | Euclid | 44132-3095 | 8/19/04 | |
| Grace | Y | Boyd-Elmore | | 1442 E 260th St 1620 | Euclid | 44132-3151 | 8/19/04 | |
| Edward | L | Hood | | 25111 Lake Shore Blvd A17 | Euclid | 44132-3920 | 8/19/04 | |
| Robert | S | Berfeld | | 8410 Wallings Rd | North Royalton | 44133-2947 | 8/19/04 | |
| Candace | | Gingerich | | 12490 State Rd | North Royalton | 44133-3245 | 8/19/04 | |
| Michael | | Koral | | 7818 Royalton Rd | North Royalton | 44133-4708 | 8/19/04 | |
| Jeremy | M | Mahon | | 16094 Louis Dr | North Royalton | 44133-5514 | 8/19/04 | |
| Jonathan | W | Roblin | | 6471 Cady Rd | North Royalton | 44133-6315 | 8/19/04 | |
| Sarah | E | Robert | | 8060 Springfield Dr | North Royalton | 44133-7018 | 8/19/04 | |
| Heidi | M | Pimentel | | 8244 Windsor Dr | North Royalton | 44133-7034 | 8/19/04 | |
| Marcus | D | Johnson | | 5767 Broadview Rd #108 | Parma | 44134-1681 | 8/19/04 | |
| Robert | L | Allison | | 1050 Omalley Dr Apt 203 | Parma | 44134-2035 | 8/19/04 | |
| Brendon | R | McCourt | | 3028 Torrington Ave | Parma | 44134-2216 | 8/20/04 | |
| Megan | K | Delaney | | 3714 Wood Ave | Parma | 44134-2332 | 8/20/04 | |
| Robert | P | Suchon | Jr | 3317 Lucerne Ave | Parma | 44134-2631 | 8/19/04 | |
| William | J | Brown | | 2518 Stanfield Dr | Parma | 44134-5004 | 8/19/04 | |
| George | | Asi | | 2818 Coventry Dr | Parma | 44134-5636 | 8/19/04 | |

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| Joseph | A | Mason | | 6800 Sandy Hook Dr | Parma | 44134-6049 | 8/20/04 | |
| Jason | A | Harding | | 7660 Broadview Rd Apt 118 | Parma | 44134-6765 | 8/19/04 | |
| Jose | | Padilla | | 4017 W 150th St | Cleveland | 44135-1301 | 8/19/04 | |
| Sear | | McGlohan | | 4298 Rocky River Dr | Cleveland | 44135-1951 | 8/19/04 | |
| Arwar | A | Saeed | | 4235 W 146th St | Cleveland | 44135-2005 | 8/19/04 | |
| Edward | E | Harris | | 4178 W 143rd St | Cleveland | 44135-2048 | 8/19/04 | |
| Marci | C | Freeman | | 4121 W 144th St | Cleveland | 44135-2053 | 8/19/04 | |
| Emmanuel | U | Jackson | | 12908 Brookfield Ave | Cleveland | 44135-2230 | 8/19/04 | |
| Richard | L | Daniel | | 4472 W 136th St | Cleveland | 44135-2912 | 8/19/04 | |
| Jason | R | Jackson | | 4541 W 130th St #11 | Cleveland | 44135-3568 | 8/20/04 | |
| Heidemarie | | Crites | | 16204 Melgrave Ave | Cleveland | 44135-4402 | 8/19/04 | |
| Andrew | | Lojgren | | 4689 W 146th St | Cleveland | 44135-4501 | 8/19/04 | |
| Claudia | A | Ananas | | 11831 Pearl Rd Apt 105 | Strongsville | 44136-3337 | 8/19/04 | |
| James | J | Esarey | | 11831 Pearl Rd Apt 204 | Strongsville | 44136-3337 | 8/19/04 | |
| Toby | D | Johnson | | 16309 Pearl Rd | Strongsville | 44136-6039 | 8/19/04 | |
| Christopher | J | Zawislak | | 16889 Rabbit Run Dr | Strongsville | 44136-6239 | 8/19/04 | |
| Calvin | T | Herron | | 14400 Granger Rd | Maple Heights | 44137-1063 | 8/19/04 | |
| Myah | L | Gray | | 5100 Lee Rd | Maple Heights | 44137-1229 | 8/19/04 | |
| Antonio | | Gaines | | 5361 Beechwood Ave | Maple Heights | 44137-2205 | 8/19/04 | |
| Ciami | S | Bell | | 19307 Libby Rd | Maple Heights | 44137-2349 | 8/19/04 | |
| Willie | L | Atkins | | 19414 Maple Heights Blvd | Maple Heights | 44137-2380 | 8/19/04 | |
| David | J | Lee | II | 16510 Maple Heights Blvd | Maple Heights | 44137-2639 | 8/19/04 | |
| Megan | M | Krejnny | | 5442 Beechwood Ave | Maple Heights | 44137-2762 | 8/19/04 | |
| Kenneth | | Garth | | 14805 Reddingron Ave | Maple Heights | 44137-3221 | 8/19/04 | |
| Darnell | E | Walker | | 5678 South Blvd | Maple Heights | 44137-3440 | 8/19/04 | |
| Gerald | L | Jones | | 5471 Dalewood Ave | Maple Heights | 44137-3501 | 8/19/04 | |
| Kalpanaben | C | Paral | | 15300 Maple Park Dr | Maple Heights | 44137-4289 | 8/19/04 | |
| Matthew | M | Piecing | | 27054 Oakwood Dr Apt 103C | Olmsted Falls | 44138-1190 | 8/20/04 | |
| Valerie | R | Bogucki | | 8562 Oakridge Dr | Olmsted Falls | 44138-1865 | 8/19/04 | |
| Alex | | Rinaldi | | 23704 Sawmill Bnd | Olmsted Falls | 44138-2895 | 8/20/04 | |
| Herman | N | Rudolph | | 32593 Haver Hill Dr | Solon | 44139-1970 | 8/20/04 | |
| Kathryn | W | Phillips | | 27104 Normandy Rd | Bay Village | 44140-2328 | 8/19/04 | |
| Michael | J | Pugacz | | 489 Canterbury Rd | Bay Village | 44140-2408 | 8/19/04 | |
| Jason | G | Crisp | | 24451 Lake Rd 604 | Bay Village | 44140-2960 | 8/19/04 | |
| Steve | N | Csanyi | | 24455 Lake Rd #1105 | Bay Village | 44140-2960 | 8/19/04 | |
| Michael | D | Bilal | III | 7787 Grenadier Ln | Brecksville | 44141-1037 | 8/20/04 | |
| Hosev | | Amos | | 8757 Brecksville Rd | Brecksville | 44141-1919 | 8/19/04 | |

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| Richard | | Barker | | 8757 Brecksville Rd | Brecksville | 44141-1919 | 8/19/04 | |
| Ray | | Williams | | 10000 Brecksville Rd | Brecksville | 44141-3204 | 8/20/04 | |
| Pamela | D | Rawls | | 10000 Brecksville Rd | Brecksville | 44141-3204 | 8/20/04 | |
| Darrel | | Briggs | | 10000 Brecksville Rd | Brecksville | 44141-3204 | 8/20/04 | |
| Joseph | L | Drachenberg | | 10000 Brecksville Rd | Brecksville | 44141-3204 | 8/20/04 | |
| Eric | A | Olsen | | 2821 Boston Rd | Brecksville | 44141-3313 | 8/19/04 | |
| Terrill | S | Byer | | 21930 Sheldon Rd Apt 201 | Brook Park | 44142-1221 | 8/19/04 | |
| Gary | D | Showers | | 6008 Engle Rd | Brook Park | 44142-2101 | 8/20/04 | |
| Michael | S | Lundy | | 6004 Engle Rd | Brook Park | 44142-2102 | 8/20/04 | |
| Wanda | | Lupita | | 5808 W 130th St | Brook Park | 44142-2601 | 8/19/04 | |
| George | M | Harris | | 6225 Adair Ct | Brook Park | 44142-3059 | 8/19/04 | |
| Richard | B | Graves | | 14333 Park Dr | Brook Park | 44142-3849 | 8/19/04 | |
| George | B | Raby | Jr | 137 Ruth Ellen Dr Apt 107 | Richmond Heights | 44143-1006 | 8/19/04 | |
| Somerae | R | Simmons | | 145 Chestnut Ln Apt 220 | Richmond Heights | 44143-1012 | 8/19/04 | |
| Tiffany | D | Figuerola | | 26645 Sandy Hill Dr | Richmond Heights | 44143-1049 | 8/19/04 | |
| Royce | E | Walker | Jr | 324 Bridgeport Trl | Richmond Heights | 44143-1464 | 8/19/04 | |
| Mike | F | Cochran | | 446 Richmond Park E | Richmond Heights | 44143-1813 | 8/19/04 | |
| Charles | J | Halco | | 4211 Fulton Pkwy Apt 123 | Cleveland | 44144-1962 | 8/19/04 | |
| Alexis | | Olmeda | | 8257 Memphis Ave NA | Brooklyn Heights | 44144-2115 | 8/19/04 | |
| Anthony | R | Ezzo | | 4683 Winter Ln | Brooklyn | 44144-2409 | 8/20/04 | |
| Faris | R | Antoon | Jr | 4416 W 53rd St UP | Cleveland | 44144-2908 | 8/19/04 | |
| Jennifer | S | Trotter | | 5100 Vandalia Ave | Cleveland | 44144-3909 | 8/19/04 | |
| Wayne | A | Bateman | | 27676 Westchester Pkwy | Westlake | 44145-1219 | 8/19/04 | |
| Catherine | | Sinnott | | 27601 Westchester Pkwy | Westlake | 44145-1251 | 8/19/04 | |
| Deborah | A | Smith | | 1310 Bobby Ln Apt 307 | Westlake | 44145-6903 | 8/20/04 | |
| Cozy | M | Guyton | | 5303 Northfield Rd | Bedford Heights | 44146-1104 | 8/19/04 | |
| Marselene | P | Norton | | 21861 Libby Rd D 24 | Bedford Heights | 44146-1204 | 8/19/04 | |
| Jimmie | L | Norris | | 22610 Libby Rd 304 | Bedford Heights | 44146-1239 | 8/19/04 | |
| Angela | | Golder | | 22155 Libby Rd | Bedford Heights | 44146-1288 | 8/19/04 | |
| Lakeisha | M | Brown | | 25021 Aurora Rd | Bedford Heights | 44146-1767 | 8/19/04 | |
| Bannah | S | Church | | 25400 Rockside Rd Apt 405 | Bedford Heights | 44146-1913 | 8/19/04 | |
| Jessica | M | Hill | | 25300 Rockside Rd Apt 514 | Bedford Heights | 44146-1920 | 8/19/04 | |
| Kristina | A | Strahl | | 25400 Rockside Rd | Bedford Heights | 44146-1932 | 8/19/04 | |
| Christopher | W | Gray | | 25300 Rockside Rd 10 | Bedford Heights | 44146-1940 | 8/19/04 | |
| Chantana | C | Adams | | 25200 Rockside Rd | Bedford Heights | 44146-1941 | 8/19/04 | |
| Terrance | J | Jenkins | | 25200 Rockside Rd | Bedford Heights | 44146-1941 | 8/19/04 | |
| Richard | A | Smolik | Jr | 433 Broadway Ave 01 | Bedford | 44146-2628 | 8/19/04 | |

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|-----------|---|-------------|---------------------------|-----------------|------------|---------|--|
| Alonzo | G | Or | 481 Broadway Ave Apt 4 | Bedford | 44146-2719 | 8/19/04 | |
| Markus | A | Jones | 5988 Bear Creek Dr | Bedford Heights | 44146-2932 | 8/19/04 | |
| Phillip | R | Littleton | 6395 S Perkins Rd | Bedford Heights | 44146-3157 | 8/19/04 | |
| Ryan | L | Brandenburg | 450 Turney Rd | Bedford | 44146-3360 | 8/19/04 | |
| Michael | T | Hannan | 128 Forest Dr | Bedford | 44146-3533 | 8/20/04 | |
| Richelle | | Lever | 66 Union St | Bedford | 44146-4522 | 8/19/04 | |
| Carlos | | Cole | 137 Union St | Bedford | 44146-4541 | 8/19/04 | |
| James | R | Copley | 26463 Solon Rd Apt 512 | Bedford | 44146-4733 | 8/19/04 | |
| Catherine | M | Lehota | 26463 Solon Rd Apt 513 | Bedford | 44146-4733 | 8/19/04 | |
| Anthony | | Diglio | 26433 Solon Dr | Bedford | 44146-4749 | 8/19/04 | |
| John | H | Young | 26433 Solon Rd | Bedford | 44146-4749 | 8/19/04 | |
| Tamika | M | Williams | 26463 Solon Rd | Bedford | 44146-4761 | 8/19/04 | |
| Cleveland | W | Gilmore | 6628 Tamarind Dr | Bedford Heights | 44146-4843 | 8/19/04 | |
| Clarence | | Miller | 7312 Kentucky Dr | Bedford | 44146-5701 | 8/19/04 | |
| Andre | A | Wilson | 22135 Libby Rd | Bedford Heights | 44146-6815 | 8/19/04 | |
| Timothy | L | Owens | 19655 Rockside Rd | Bedford | 44146-7203 | 8/19/04 | |
| George | E | Brooke | 19655 Rockside Rd | Bedford | 44146-7203 | 8/19/04 | |
| Robin | S | Adams | 1654 E Royalton Rd #3 | Bedford | 44146-7203 | 8/19/04 | |
| Barndon | | Lee | 1637 Valley Parkway Dr | Bedford Heights | 44147-2549 | 8/19/04 | |
| Roger | A | Stevens | 1000 Vineyard Dr | Bedford Heights | 44147-3052 | 8/19/04 | |
| Claudia | K | Ortiz | 1389 Apple Valley Ct | Bedford Heights | 44147-3392 | 8/19/04 | |
| Theresa | C | Eiber | 1295 Cloverberry Ct | Bedford Heights | 44147-3640 | 8/19/04 | |
| Thomas | | Timmins | 1700 Seneca Blvd #103 | Bedford Heights | 44147-3685 | 8/19/04 | |
| Mary | | Lauren | 20052 Idlewood Trl | Bedford Heights | 44147-3911 | 8/20/04 | |
| Julie | B | Anderson | 20466 Westwood Dr | Bedford Heights | 44149-3142 | 8/20/04 | |
| Nicholas | | Flanagan | 20448 Scott Dr | Bedford Heights | 44149-3901 | 8/20/04 | |
| Albert | A | Salim | 17171 Greenwood Dr | Bedford Heights | 44149-4989 | 8/19/04 | |
| Tierra | D | Barnes | 1356 E 131st St | Bedford Heights | 44149-5826 | 8/19/04 | |
| Charles | | Tompkins | 13995 Superior Rd Apt 510 | Bedford Heights | | 8/18/04 | |
| Darnell | F | Boylan | 13995 Superior Rd Apt 704 | Bedford Heights | | 8/19/04 | |
| Adam | S | Wilcox | 1834 W 54th St | Bedford Heights | | 8/20/04 | |
| Molly | T | Daw | 2862 Corydon Rd | Bedford Heights | | 8/19/04 | |
| Holly | M | Teron | 622 North St | Bedford Heights | | 8/19/04 | |

Exhibit 7

Kelly Ganzberger - Legal

From: drachelson@georgewbush.com
Sent: Tuesday, October 05, 2004 6:49 PM
To: Tyler Lown; Wade Lairsen; Lauren Barnett - Political; Holland Patterson - Political; Trey Best - Political; Janey Rudd - Communications; Courtney Sanders - Research/Communications; Kelly Ganzberger - Legal; John Parker; Michael Neal - Political; zdeitch@georgewbush.com; Elizabeth Toon
Subject: RE: Voter Reg Fraud Strategy conference calls

We've locked down a time and an email will go out shortly - believe we're all on the same page -

-----Original Message-----

From: Tyler Lown
Sent: Tuesday, October 05, 2004 6:48 PM
To: Wade Lairsen; Lauren Barnett; 'Holland Patterson - Political'; 'Trey Best - Political'; Janey Rudd - RNC; 'Courtney Sanders - Research/Communications'; 'Kelly Ganzberger - Legal'; John Parker; David Rachelson; 'Michael Neal - Political'; Zach Dietch; Elizabeth Toon
Subject: RE: Voter Reg Fraud Strategy conference calls

Any update on where we stand with scheduling these?

Tyler Lown
Bush-Cheney '04, Inc.
Election Day Operations
703.647.2789

-----Original Message-----

From: Wade Lairsen
Sent: Tuesday, October 05, 2004 8:28 AM
To: Lauren Barnett; Holland Patterson - Political; Trey Best - Political; Janey Rudd - RNC; Courtney Sanders - Research/Communications; Kelly Ganzberger - Legal; John Parker; David Rachelson; Michael Neal - Political; Tyler Lown; Zach Dietch; Elizabeth Toon
Subject: RE: Voter Reg Fraud Strategy conference calls

Does anyone have a problem with 1:30, 2:30, and 8:30 for these calls? These are the times that I have been able to confirm with all of the folks at the campaign. We do have someone that will be on a flight from the legal team here, which would conflict with doing these all in the evening. Thanks.

-----Original Message-----

From: Lauren Barnett
Sent: Tuesday, October 05, 2004 12:14 AM
To: Holland Patterson - Political; Trey Best - Political; Janey Rudd - RNC; Courtney Sanders - Research/Communications; Kelly Ganzberger - Legal; John Parker; David Rachelson; Wade Lairsen; Michael Neal - Political; Tyler Lown
Subject: RE: Voter Reg Fraud Strategy conference calls

Can we all pull together first thing in the morning to schedule these? Believe, we've finally isolated Tuesday (10/5) early evenings -

Please advise if anyone's principle has a conflict that cannot be rescheduled.

RNC 000177

Confidential Information -
Subject to Protective Order

* Quick revision: State Chairman's participation is greatly appreciated but no longer required. As such, when we confirm exact states' times, RNC Coordinators please reach out but convey they do not necessarily need to join.

Thanks

> -----Original Message-----
> From: Lauren Barnett - Political
> Sent: Thursday, September 30, 2004 12:16 AM
> To: Holland Patterson - Political; Trey Best - Political; Janey Rudd
- Communications; Courtney Sanders - Research/Communications; Kelly
Ganzberger - Legal; John Parker; David Rachelson (E-mail); Wade Lairsen
(E-mail); Michael Neal - Political; 'tlownd@georgewbush.com'
> Cc: Blaise Hazelwood - Political
> Subject: Voter Reg Fraud Strategy conference calls
>
> Team,
>
> We've been asked to schedule the remaining HAVA / Voter Reg Fraud
> Strategy conference calls by week's end.
>
> NV
> OH
> NM
> PA
> (Note: FL was conducted today, 9/29)
>
>
> RNC Coordinators - Please discern the State Chairman's availability.
> BC04 Team - I haven't added all your folks to this preliminary email -
please advise / forward as you see best.
>
> Suggested Windows:
> Thursday 9/30: 4:00 pm - 6:30 pm EDT
> Friday 10/1: 8:00 am - 11:30 am EDT
> 12:00 pm - 2:00 pm EDT
> 3:00 pm - 6:30 pm EDT
> Let's assume 30 minutes per state. <NOTE: Calls must be separate,
> individual with each state. As such, we need to find 2 hours of
time.>
> Suggested Participants:
> State Leadership (*State Chair especially*)
> RNC RPD
> Caroline Hunter
> Jill Holtzman-Vogel
> Jim Dyke
> Blaise
> Tim Griffin
> Tom J.
> Cuddy
> BC04 RPD
> Thor
> Christopher Guith
> Jennifer Millerwise and/or Reed Dickens
>
> Glad to jump on a quick scheduling call with folks to figure this out.
>
> Thank you in advance!!
>
>

RNC 000178

Confidential Information -
Subject to Protective Order

Kelly Ganzberger - Legal

From: Janey Rudd - Communications
Sent: Tuesday, October 05, 2004 8:42 AM
To: 'Tyler Lown'; Kelly Ganzberger - Legal; 'Wade Lairsen'; Lauren Barnett - Political; Holland Patterson - Political; Trey Best - Political; Courtney Sanders - Research/Communications; John Parker; drachelson@georgewbush.com; Michael Neal - Political; zdeitch@georgewbush.com; 'Elizabeth Toon'
Subject: RE: Voter Reg Fraud Strategy conference calls

Jim is in cleveland today

-----Original Message-----

From: Tyler Lown [mailto:tlownd@georgewbush.com]
Sent: Tue Oct 05 08:34:41 2004
To: Kelly Ganzberger - Legal; Wade Lairsen; Lauren Barnett - Political; Holland Patterson - Political; Trey Best - Political; Janey Rudd - Communications; Courtney Sanders - Research/Communications; John Parker; drachelson@georgewbush.com; Michael Neal - Political; zdeitch@georgewbush.com; Elizabeth Toon
Subject: RE: Voter Reg Fraud Strategy conference calls

Christopher is also available.

Tyler Lown
Bush-Cheney '04, Inc.
Election Day Operations
703.647.2789

-----Original Message-----

From: Kelly Ganzberger - Legal [mailto:KGanzberger@rnchq.org]
Sent: Tuesday, October 05, 2004 8:34 AM
To: Wade Lairsen; Lauren Barnett; Holland Patterson - Political; Trey Best - Political; Janey Rudd - RNC; Courtney Sanders - Research/Communications; John Parker; David Rachelson; Michael Neal - Political; Tyler Lown; Zach Dietch; Elizabeth Toon
Subject: RE: Voter Reg Fraud Strategy conference calls

Jill is available at the times you listed.

-----Original Message-----

From: Wade Lairsen [mailto:wlairsen@georgewbush.com]
Sent: Tuesday, October 05, 2004 8:28 AM
To: Lauren Barnett - Political; Holland Patterson - Political; Trey Best - Political; Janey Rudd - Communications; Courtney Sanders - Research/Communications; Kelly Ganzberger - Legal; John Parker; drachelson@georgewbush.com; Michael Neal - Political; Tyler Lown; zdeitch@georgewbush.com; Elizabeth Toon
Subject: RE: Voter Reg Fraud Strategy conference calls

Does anyone have a problem with 1:30, 2:30, and 8:30 for these calls? These are the times that I have been able to confirm with all of the folks at the campaign. We do have someone that will be on a flight from the legal team here, which would conflict with doing these all in the evening. Thanks.

-----Original Message-----

From: Lauren Barnett
Sent: Tuesday, October 05, 2004 12:14 AM
To: Holland Patterson - Political; Trey Best - Political; Janey Rudd -

RNC 000179

Confidential Information -
Subject to Protective Order

RNC; Courtney Sanders - Research/Communications; Kelly Ganzberger - Legal; John Parker; David Rachelson; Wade Lairsen; Michael Neal - Political; Tyler Lown
Subject: RE: Voter Reg Fraud Strategy conference calls

Can we all pull together first thing in the morning to schedule these? Believe, we've finally isolated Tuesday (10/5) early evenings -

Please advise if anyone's principle has a conflict that cannot be rescheduled.

* Quick revision: State Chairman's participation is greatly appreciated but no longer required. As such, when we confirm exact states' times, RNC Coordinators please reach out but convey they do not necessarily need to join.

Thanks

> -----Original Message-----
> From: Lauren Barnett - Political
> Sent: Thursday, September 30, 2004 12:16 AM
> To: Holland Patterson - Political; Trey Best - Political; Janey Rudd - Communications; Courtney Sanders - Research/Communications; Kelly Ganzberger - Legal; John Parker; David Rachelson (E-mail); Wade Lairsen (E-mail); Michael Neal - Political; 'tlown@georgewbush.com'
> Cc: Blaise Hazelwood - Political
> Subject: Voter Reg Fraud Strategy conference calls
>
> Team,
>
> We've been asked to schedule the remaining HAVA / Voter Reg Fraud Strategy conference calls by week's end.
>
> NV
> OH
> NM
> PA
> (Note: FL was conducted today, 9/29)
>
>
> RNC Coordinators - Please discern the State Chairman's availability.
> BC04 Team - I haven't added all your folks to this preliminary email - please advise / forward as you see best.
>
> Suggested Windows:
> Thursday 9/30: 4:00 pm - 6:30 pm EDT
> Friday 10/1: 8:00 am - 11:30 am EDT
> 12:00 pm - 2:00 pm EDT
> 3:00 pm - 6:30 pm EDT
> Let's assume 30 minutes per state. <NOTE: Calls must be separate, individual with each state. As such, we need to find 2 hours of time.>
>
> Suggested Participants:
> State Leadership (*State Chair especially*)
> RNC RPD
> Caroline Hunter
> Jill Holtzman-Vogel
> Jim Dyke
> Blaise
> Tim Griffin
> Tom J.
> Caddy
> BC04 RPD
> Thor
> Christopher Guith

RNC 000180

> Jennifer Millerwise and/or Reed Dickens

>

> Glad to jump on a quick scheduling call with folks to figure this out.
Thank you in advance!!

>

>

Kelly Ganzberger - Legal

From: Wade Lairsen [wlairsen@georgewbush.com]
Sent: Friday, October 01, 2004 9:06 AM
To: Lauren Barnett - Political; Holland Patterson - Political; Trey Best - Political; Janey Rudd - Communications; Courtney Sanders - Research/Communications; Kelly Ganzberger - Legal; John Parker; drachelson@georgewbush.com; Michael Neal - Political; Tyler Lown
Subject: RE: Voter Reg Fraud Strategy conference calls

Please disregard my last email.

-----Original Message-----

From: Lauren Barnett
Sent: Friday, October 01, 2004 8:42 AM
To: Holland Patterson - Political; Trey Best - Political; Janey Rudd - RNC; Courtney Sanders - Research/Communications; Kelly Ganzberger - Legal; John Parker; David Rachelson; Wade Lairsen; Michael Neal - Political; Tyler Lown
Subject: RE: Voter Reg Fraud Strategy conference calls

Bad news bears...

A few folks have conflicts that can't be rescheduled. We'll look to Monday to reschedule these -- I will round up with everyone shortly.

Sorry for the late notice.

> -----Original Message-----

> **From:** Lauren Barnett - Political
> **Sent:** Thursday, September 30, 2004 6:11 PM
> **To:** Holland Patterson - Political; Trey Best - Political; Janey Rudd - Communications; Courtney Sanders - Research/Communications; Kelly Ganzberger - Legal; John Parker; 'David Rachelson (E-mail)'; 'Wade Lairsen (E-mail)'; Michael Neal - Political; 'tlown@georgewbush.com'
> **Subject:** RE: Voter Reg Fraud Strategy conference calls

> Thanks for your patience, yall - We've had a few scheduling shifts in light of debate travel, etc.

> We would like to propose 3 times tomorrow (NV, NM, OH).

> 1:00 - 1:30 PM EDT

> 5:00 - 5:30 PM EDT

> 5:30 - 6:00 PM EDT

> BC04 Team: Please advise if your principle has a conflict which any of these options.

> Trey & Holland: Can you please ask your state parties and confirm their participation?

> Trey: Please discern when PA can hold this call early next week ... Monday, preferably.

> Thank you for helping lock these in -- we'll circle up again shortly.

> LB

RNC 000182

>
> -----Original Message-----
> From: Lauren Barnett - Political
> Sent: Thursday, September 30, 2004 12:16 AM
> To: Holland Patterson - Political; Trey Best - Political;
Janey Rudd - Communications; Courtney Sanders - Research/Communications;
Kelly Ganzberger - Legal; John Parker; David Rachelson (E-mail); Wade
Lairsen (E-mail); Michael Neal - Political; 'tlownd@georgewbush.com'
> Cc: Blaise Hazelwood - Political
> Subject: Voter Reg Fraud Strategy conference calls
>
> Team,
>
> We've been asked to schedule the remaining HAVA / Voter Reg
Fraud Strategy conference calls by week's end.
>
> NV
> OH
> NM
> PA
> (Note: FL was conducted today, 9/29)
>
>
> RNC Coordinators - Please discern the State Chairman's
availability.
> BC04 Team - I haven't added all your folks to this preliminary
email - please advise / forward as you see best.
>
> Suggested Windows:
> Thursday 9/30: 4:00 pm - 6:30 pm EDT
> Friday 10/1: 8:00 am - 11:30 am EDT
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> 3:00 pm - 6:30 pm EDT
> Let's assume 30 minutes per state. <NOTE: Calls must be
separate, individual with each state. As such, we need to find 2 hours
of time.>
> Suggested Participants:
> State Leadership (*State Chair especially*)
> RNC RPD
> Caroline Hunter
> Jill Holtzman-Vogel
> Jim Dyke
> Blaise
> Tim Griffin
> Tom J.
> Cuddy
> BC04 RPD
> Thor
> Christopher Guith
> Jennifer Millerwise and/or Reed Dickens
>
> Glad to jump on a quick scheduling call with folks to figure
this out. Thank you in advance!!
>
>

RNC 000183

Kelly Ganzberger - Legal

From: Jill HoltzmanVogel - Legal
Sent: Thursday, September 30, 2004 11:08 AM
To: Kelly Ganzberger - Legal
Subject: RE: Voter Reg Fraud Strategy conference calls

Morning works best for me.

J

-----Original Message-----

From: Kelly Ganzberger - Legal
Sent: Thursday, September 30, 2004 10:49 AM
To: Jill HoltzmanVogel - Legal
Subject: FW: Voter Reg Fraud Strategy conference calls

FYI

-----Original Message-----

From: Lauren Barnett - Political
Sent: Thursday, September 30, 2004 10:48 AM
To: Holland Patterson - Political; Trey Best - Political; Janey Rudd - Communications; Courtney Sanders - Research/Communications; Kelly Ganzberger - Legal; John Parker; drachelson@georgewbush.com; 'Wade Lairsen (E-mail)'; Michael Neal - Political; 'tdown@georgewbush.com'
Subject: RE: Voter Reg Fraud Strategy conference calls

The option for calls today is out -- so folks can release that as an option.

Please continue to hold the Friday morning windows, that appears to be the best -

Thanks.

-----Original Message-----

From: Lauren Barnett - Political
Sent: Thursday, September 30, 2004 12:16 AM
To: Holland Patterson - Political; Trey Best - Political; Janey Rudd - Communications; Courtney Sanders - Research/Communications; Kelly Ganzberger - Legal; John Parker; David Rachelson (E-mail); Wade Lairsen (E-mail); Michael Neal - Political; 'tdown@georgewbush.com'
Cc: Blaise Hazelwood - Political
Subject: Voter Reg Fraud Strategy conference calls

Team,

We've been asked to schedule the remaining HAVA / Voter Reg Fraud Strategy conference calls by week's end.

NV

OH

NM

PA

(Note: FL was conducted today, 9/29)

RNC Coordinators - Please discern the State Chairman's availability.

BC04 Team - I haven't added all your folks to this preliminary email - please advise / forward as you see best.

Suggested Windows:

RNC 000184

Confidential Information -
Subject to Protective Order

Thursday 9/30: 4:00 pm - 6:30 pm EDT

Friday 10/1: 8:00 am - 11:30 am EDT

12:00 pm - 2:00 pm EDT

3:00 pm - 6:30 pm EDT

Let's assume 30 minutes per state. <NOTE: Calls must be separate, individual with each state. As such, we need to find 2 hours of time.>

Suggested Participants:

State Leadership (*State Chair especially*)

RNC RPD

Caroline Hunter

Jill Holtzman-Vogel

Jim Dyke

Blaise

Tim Griffin

Tom J.

Coddy

BC04 RPD

Thor

Christopher Guith

Jennifer Millerwise and/or Reed Dickens

Glad to jump on a quick scheduling call with folks to figure this out. Thank you in advance!!

RNC 000185

Confidential Information -
Subject to Protective Order

Exhibit 8

Participants
Chairman Gillespie
Maria Cino
Mike Duncan
Jim Dyke
Tim Griffin
Jill Holtzman Vogel
Caroline Hunter

Blaise Hazelwood - Political

From: cguith@georgewbush.com
Sent: Tuesday, October 05, 2004 6:33 PM
To: Tim Griffin - Research/Communications; Cuddy Johnson; Blaise Hazelwood - Political; Terry Nelson
Cc: Shawn Reinschmidt - Research/Communications; Christopher P. McInerney - Research/Communications
Subject: RE: Cuyahoga Returned List

So how best do we proceed?

-----Original Message-----

From: Tim Griffin
Sent: Tuesday, October 05, 2004 6:29 PM
To: Christopher Guith; Cuddy Johnson; Blaise Hazelwood; Terry Nelson
Cc: Shawn Reinschmidt - Research/Communications; Christopher P. McInerney - Research/Communications
Subject: Re: Cuyahoga Returned List

Yes agree
Tim Griffin
Research Director and
Deputy Communications Director
Republican National Committee
310 First Street, S.E.
Washington, D.C. 20003
w: (202) 863-8815
f: (202) 863-8744
tgriffin@rnchq.org

-----Original Message-----

From: cguith@georgewbush.com <cguith@georgewbush.com>
To: Tim Griffin - Research/Communications <tgriffin@rnchq.org>; Cuddy Johnson <cjohnson@georgewbush.com>; Blaise Hazelwood - Political <bhazelwood@rnchq.org>; Terry Nelson <tnelson@georgewbush.com>
CC: Shawn Reinschmidt - Research/Communications <SReinschmidt@rnchq.org>; Christopher P. McInerney - Research/Communications <CMcInerney@rnchq.org>
Sent: Tue Oct 05 18:26:07 2004
Subject: RE: Cuyahoga Returned List

I would think we are less worried about "fingerprints" if we have decent evidence that fraudulent ballots are being cast. I think the intent is to take the list and challenge ABs? At that point, isn't it more important to stop ABs that we have a hi certainty of fraud than avoid the hit?

-----Original Message-----

From: Tim Griffin
Sent: Tuesday, October 05, 2004 6:01 PM
To: Christopher Guith; Cuddy Johnson; Blaise Hazelwood; Terry Nelson
Cc: Shawn Reinschmidt - Research/Communications; Christopher P.

RNC 000147

McInerney - Research/Communications
Subject: RE: Cuyahoga Returned List

chris mc says this:

Jack Christopher and I have already tasked our IT person with creating a match list between the BoE's return mail list and the AB request list. Jack thought this would be a good idea to have - to reference as part of the larger DenHerder press strategy. We should have the result of this match later tonight.

I can't speak to other states, but if they don't have flagged voter rolls, we run the risk of having GOP fingerprints...

-CM

-----Original Message-----

From: cguith@georgewbush.com
Sent: Tuesday, October 05, 2004 5:45 PM
To: Tim Griffin - Research/Communications; Caddy Johnson; Blaise Hazelwood - Political; Terry Nelson
Cc: Shawn Reinschmiedt - Research/Communications
Subject: RE: Cuyahoga Returned List

Does Chris M know how it worked in OH? Can he reach out to Jack Christopher to get a sense?

-----Original Message-----

From: Tim Griffin
Sent: Tuesday, October 05, 2004 5:34 PM
To: Caddy Johnson; Blaise Hazelwood; Terry Nelson
Cc: Christopher Guith; Shawn Reinschmiedt - Research/Communications
Subject: RE: Cuyahoga Returned List

if you want to compare our mailings to the absentee ballot requested, that might work. not sure how labor intensive it would be.

-----Original Message-----

From: Caddy Johnson
Sent: Tuesday, October 05, 2004 5:01 PM
To: Blaise Hazelwood - Political; Terry Nelson; Tim Griffin - Research/Communications
Cc: cguith@georgewbush.com
Subject: FW: Cuyahoga Returned List

We should do this in all these states - flag the reg returns vs. the AB ballots requested, no?

C

-----Original Message-----

From: Christopher Guith
Sent: Tuesday, October 05, 2004 4:59 PM
To: Caddy Johnson; Robert Paduchik; 'Mike Magan'; Dave DenHerder; Caroline Hunter - Legal
Subject: RE: Cuyahoga Returned List

We can do this in NV, FL, PA, and NM because we have a list to run against the AB requests, and should.

But to my knowledge, OH is the only state that requires the counties to keep a list of "flagged" registrations from bounce backed mailings.

RNC 000148

-----Original Message-----

From: Cuddy Johnson
Sent: Tuesday, October 05, 2004 3:31 PM
To: Robert Paduchik; 'Mike Magan'; Dave DenHerder; Christopher Guith
Subject: RE: Cuyahoga Returned List

We need to be doing this in other states as well -

Guith - advise -

C

=====

Sign up to be a Bush Volunteer! www.georgewbush.com/volunteer
===== Cuddy Johnson National Field Director,
Bush-Cheney '04
work: 703-647-2733
cell: 202-441-4733
fax: 703-647-2995
email: cjohnson@georgewbush.com

-----Original Message-----

From: Robert Paduchik
Sent: Tuesday, October 05, 2004 3:21 PM
To: 'Mike Magan'; Cuddy Johnson; Dave DenHerder; Christopher Guith
Subject: RE: Cuyahoga Returned List

A bad registration card can be an accident or fraud. A bad card AND an Absentee Ballot request is a clear case of fraud.

-----Original Message-----

From: Mike Magan [<mailto:Magan@ohiogop.org>]
Sent: Tuesday, October 05, 2004 3:19 PM
To: Robert Paduchik; Cuddy Johnson; Dave DenHerder; Christopher Guith
Subject: RE: Cuyahoga Returned List

We are doing a larger check on this tonight running the Franklin Co return list against the AB requests. We will have to start doing this in our target counties. I am coordinating with Amanda Walker to see how ORP is coming along with uploading AB requests in the system.

Mike

Michael Magan
Ohio Republican Party
211 South Fifth Street
Columbus, OH 43215
Office: (614)228-2481 ext. 148
Cell: (614)425-6519
Fax: (614)228-1093
magan@ohiogop.org

-----Original Message-----

From: Robert Paduchik [<mailto:bpaduchik@georgewbush.com>]
Sent: Tuesday, October 05, 2004 3:16 PM
To: Cuddy Johnson; Dave DenHerder; Christopher Guith; Mike Magan
Subject: RE: Cuyahoga Returned List
Importance: High

I have just learned that Summit County has recvd 200 AB requests from

205

RNC 000149

Confidential Information -
Subject to Protective Order

"10-U voters" (these are people the BOE mails address confirmation forms to and they're returned as undeliverable). If this is true it is proof that people with questionable registrations are trying to vote absentee.

-----Original Message-----

From: Cuddy Johnson
Sent: Tuesday, October 05, 2004 3:05 PM
To: 'SReinschmiedt@rnchq.org'; Dave DenHerder; Robert Paduchik; Christopher Guith; 'Magan@ohiogop.org'; Kevin Madden; 'Mauk@ohiogop.org'
Cc: 'CMcInerney@rnchq.org'; Tim Griffin; Sean Cairncross
Subject: Re: Cuyahoga Returned List

This is goldmine

-----Original Message-----

From: Shawn Reinschmiedt - Research/Communications
<SReinschmiedt@rnchq.org>
To: Dave DenHerder <ddenherder@georgewbush.com>; Cuddy Johnson <cjohnson@georgewbush.com>; Robert Paduchik <bpaduchik@georgewbush.com>; Christopher Guith <cguith@georgewbush.com>; Mike Magan (E-mail) <Magan@ohiogop.org>; Kevin Madden <kmadden@georgewbush.com>; Mauk@ohiogop.org <Mauk@ohiogop.org>
CC: Christopher P. McInerney - Research/Communications <CMcInerney@rnchq.org>; Tim Griffin <Tgriffin@rnchq.org>; Sean Cairncross <scairncross@rnchq.org>
Sent: Tue Oct 05 14:51:50 2004
Subject: Cuyahoga Returned List

Received Cuyahoga county returned mailing/inactive CD from McInerney. I extracted from the total returned list (of kick backs from the county's own mailing), the ACT and ACORN #s .

> NOTE: This is just a partial list, as the BOE was unable to put onto a CD the entire returned mailings to date. It does, however give a great snapshot.

>
> According to the CD, there have been 502 returned registration mailings for ACT, and 1068 for ACORN.

>
> > <<Inactive Returned List-ACT.xls>> > > <<Inactive Returned List-ACORN.xls>>

>
>
>

RNC 000150

Blaise Hazelwood - Political

From: Tim Griffin - Research/Communications
Sent: Tuesday, October 05, 2004 6:35 PM
To: cguith@georgewbush.com; Cuddy Johnson; Blaise Hazelwood - Political; Terry Nelson
Cc: Shawn Reinschmiedt - Research/Communications; Christopher P. McInerney - Research/Communications
Subject: RE: Cuyahoga Returned List

i guess we have to make sure we have bodies. it seems like it always comes down to bodies.

why dont you ask your peeps in each state at issue if they have the resources to do this. then, i might can put some resources in the states that are lacking.

-----Original Message-----

From: cguith@georgewbush.com
Sent: Tuesday, October 05, 2004 6:33 PM
To: Tim Griffin - Research/Communications; Cuddy Johnson; Blaise Hazelwood - Political; Terry Nelson
Cc: Shawn Reinschmiedt - Research/Communications; Christopher P. McInerney - Research/Communications
Subject: RE: Cuyahoga Returned List

So how best do we proceed?

-----Original Message-----

From: Tim Griffin
Sent: Tuesday, October 05, 2004 6:29 PM
To: Christopher Guith; Cuddy Johnson; Blaise Hazelwood; Terry Nelson
Cc: Shawn Reinschmiedt - Research/Communications; Christopher P. McInerney - Research/Communications
Subject: Re: Cuyahoga Returned List

Yes agree
Tim Griffin
Research Director and
Deputy Communications Director
Republican National Committee
310 First Street, S.E.
Washington, D.C. 20003
w: (202) 863-8815
f: (202) 863-8744
tgriffin@rnchq.org

-----Original Message-----

From: cguith@georgewbush.com <cguith@georgewbush.com>
To: Tim Griffin - Research/Communications <tgriffin@rnchq.org>; Cuddy Johnson <cjohnson@georgewbush.com>; Blaise Hazelwood - Political <bhazelwood@rnchq.org>; Terry Nelson <tnelson@georgewbush.com>
CC: Shawn Reinschmiedt - Research/Communications <SReinschmiedt@rnchq.org>; Christopher P. McInerney - Research/Communications <CMcInerney@rnchq.org>
Sent: Tue Oct 05 18:26:07 2004
Subject: RE: Cuyahoga Returned List

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RNC 000151

-----Original Message-----

From: Tim Griffin
Sent: Tuesday, October 05, 2004 6:01 PM
To: Christopher Guith; Cuddy Johnson; Blaise Hazelwood; Terry Nelson
Cc: Shawn Reinschmidt - Research/Communications; Christopher P. McInerney - Research/Communications
Subject: RE: Cuyahoga Returned List

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Subject: RE: Cuyahoga Returned List

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Sent: Tuesday, October 05, 2004 4:59 PM
To: Cuddy Johnson; Robert Paduchik; 'Mike Magan'; Dave DenHerder; Caroline Hunter - Legal
Subject: RE: Cuyahoga Returned List

RNC 000152

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Office: (614) 228-2481 ext. 148
Cell: (614) 425-6519
Fax: (614) 228-1093
magan@ohiogop.org

-----Original Message-----

From: Robert Paduchik [<mailto:bpaduchik@georgewbush.com>]
Sent: Tuesday, October 05, 2004 3:16 PM

RNC 000153

To: Cuddy Johnson; Dave DenHerder; Christopher Guith; Mike Magan
Subject: RE: Cuyahoga Returned List
Importance: High

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Sent: Tuesday, October 05, 2004 3:05 PM
To: 'SReinschmiedt@rnchq.org'; Dave DenHerder; Robert Paduchik; Christopher Guith; 'Magan@ohiogop.org'; Kevin Madden; 'Mauk@ohiogop.org'
Cc: 'CMcInerney@rnchq.org'; Tim Griffin; Sean Cairncross
Subject: Re: Cuyahoga Returned List

This is goldmine

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From: Shawn Reinschmiedt - Research/Communications
<SReinschmiedt@rnchq.org>
To: Dave DenHerder <ddenherder@georgewbush.com>; Cuddy Johnson <cjohnson@georgewbush.com>; Robert Paduchik <bpaduchik@georgewbush.com>; Christopher Guith <cguith@georgewbush.com>; Mike Magan (E-mail) <Magan@ohiogop.org>; Kevin Madden <kmadden@georgewbush.com>; Mauk@ohiogop.org <Mauk@ohiogop.org>
CC: Christopher P. McInerney - Research/Communications <CMcInerney@rnchq.org>; Tim Griffin <Tgriffin@rnchq.org>; Sean Cairncross <scairncross@rnchq.org>
Sent: Tue Oct 05 14:51:50 2004
Subject: Cuyahoga Returned List

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>
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RNC 000154

Blaise Hazelwood - Political

From: Tim Griffin - Research/Communications
Sent: Tuesday, October 05, 2004 6:29 PM
To: cguith@georgewbush.com; Cuddy Johnson; Blaise Hazelwood - Political; Terry Nelson
Cc: Shawn Reinschmiedt - Research/Communications; Christopher P. McInerney - Research/Communications
Subject: Re: Cuyahoga Returned List

Yes agree
Tim Griffin
Research Director and
Deputy Communications Director
Republican National Committee
310 First Street, S.E.
Washington, D.C. 20003
w: (202) 863-8815
f: (202) 863-8744
tgriffin@rnchq.org

-----Original Message-----

From: cguith@georgewbush.com <cguith@georgewbush.com>
To: Tim Griffin - Research/Communications <tgriffin@rnchq.org>; Cuddy Johnson <cjohnson@georgewbush.com>; Blaise Hazelwood - Political <bhazelwood@rnchq.org>; Terry Nelson <tnelson@georgewbush.com>
Cc: Shawn Reinschmiedt - Research/Communications <SReinschmiedt@rnchq.org>; Christopher P. McInerney - Research/Communications <CMcInerney@rnchq.org>
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RNC 000155

Subject: RE: Cuyahoga Returned List

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RNC 000156

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To: 'Mike Magan'; Caddy Johnson; Dave DenHerder; Christopher Guith
Subject: RE: Cuyahoga Returned List

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Office: (614)228-2481 ext. 148
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Subject: Re: Cuyahoga Returned List

This is goldmine

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From: Shawn Reinschmiedt - Research/Communications
<SReinschmiedt@rnchq.org>
To: Dave DenHerder <ddenherder@georgewbush.com>; Caddy Johnson <cjohnson@georgewbush.com>; Robert Paduchik <bpaduchik@georgewbush.com>; Christopher Guith <cguith@georgewbush.com>; Mike Magan (E-mail) <Magan@ohiogop.org>; Kevin Madden <kmadden@georgewbush.com>; Mauk@ohiogop.org <Mauk@ohiogop.org>
CC: Christopher P. McInerney - Research/Communications

RNC 000157

<CMcInerney@rnchq.org>; Tim Griffin <Tgriffin@rnchq.org>; Sean
Cairncross <scairncross@rnchq.org>
Sent: Tue Oct 05 14:51:50 2004
Subject: Cuyahoga Returned List

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From: cguith@georgewbush.com
Sent: Tuesday, October 05, 2004 5:45 PM

RNC 000158

To: Tim Griffin - Research/Communications; Caddy Johnson; Blaise
Hazelwood - Political; Terry Nelson
Cc: Shawn Reinschmiedt - Research/Communications
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===== Caddy Johnson National Field Director,
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work: 703-647-2733

RNC 000159

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Christopher Guith <cguth@georgewbush.com>; Mike Magan (E-mail)

RNC 000160

<Magan@ohiogop.org>; Kevin Madden <kmadden@georgewbush.com>;
Mauk@ohiogop.org <Mauk@ohiogop.org>
CC: Christopher P. McInerney - Research/Communications
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RNC 000163

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Blaise Hazelwood - Political

From: Tim Griffin - Research/Communications
Sent: Tuesday, October 05, 2004 5:45 PM
To: cguith@georgewbush.com; Cuddy Johnson; Blaise Hazelwood - Political; Terry Nelson
Cc: Shawn Reinschmidt - Research/Communications
Subject: RE: Cuyahoga Returned List

sure

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Sent: Tuesday, October 05, 2004 5:45 PM
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Cc: cguith@georgewbush.com
Subject: FW: Cuyahoga Returned List

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C

-----Original Message-----

From: Christopher Guith
Sent: Tuesday, October 05, 2004 4:59 PM
To: Cuddy Johnson; Robert Paduchik; 'Mike Magan'; Dave DenHerder; Caroline Hunter - Legal

RNC 000164

Subject: RE: Cuyahoga Returned List

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From: Caddy Johnson

Sent: Tuesday, October 05, 2004 3:31 PM

To: Robert Paduchik; 'Mike Magan'; Dave DenHerder; Christopher Guith

Subject: RE: Cuyahoga Returned List

We need to be doing this in other states as well -

Guith - advise -

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=====

Sign up to be a Bush Volunteer! www.georgewbush.com/volunteer

===== Caddy Johnson National Field Director,

Bush-Cheney '04

work: 703-647-2733

cell: 202-441-4733

fax: 703-647-2995

email: cjohnson@georgewbush.com

-----Original Message-----

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To: 'Mike Magan'; Caddy Johnson; Dave DenHerder; Christopher Guith

Subject: RE: Cuyahoga Returned List

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From: Mike Magan [<mailto:Magan@ohiogop.org>]

Sent: Tuesday, October 05, 2004 3:19 PM

To: Robert Paduchik; Caddy Johnson; Dave DenHerder; Christopher Guith

Subject: RE: Cuyahoga Returned List

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Mike

Michael Magan

Ohio Republican Party

211 South Fifth Street

Columbus, OH 43215

Office: (614)228-2481 ext. 148

Cell: (614)425-6519

Fax: (614)228-1093

magan@ohiogop.org

RNC 000165

-----Original Message-----

From: Robert Paduchik [mailto:bpaduchik@georgewbush.com]
Sent: Tuesday, October 05, 2004 3:16 PM
To: Caddy Johnson; Dave DenHerder; Christopher Guith; Mike Magan
Subject: RE: Cuyahoga Returned List
Importance: High

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From: Caddy Johnson
Sent: Tuesday, October 05, 2004 3:05 PM
To: 'SReinschmiedt@rnchq.org'; Dave DenHerder; Robert Paduchik; Christopher Guith; 'Magan@ohiogop.org'; Kevin Madden; 'Mauk@ohiogop.org'
Cc: 'CMcInerney@rnchq.org'; Tim Griffin; Sean Cairncross
Subject: Re: Cuyahoga Returned List

This is goldmine

-----Original Message-----

From: Shawn Reinschmiedt - Research/Communications
<SReinschmiedt@rnchq.org>
To: Dave DenHerder <dhenherder@georgewbush.com>; Caddy Johnson <cjohnson@georgewbush.com>; Robert Paduchik <bpaduchik@georgewbush.com>; Christopher Guith <cguth@georgewbush.com>; Mike Magan (E-mail) <Magan@ohiogop.org>; Kevin Madden <kmadden@georgewbush.com>; Mauk@ohiogop.org <Mauk@ohiogop.org>
CC: Christopher P. McInerney - Research/Communications <CMcInerney@rnchq.org>; Tim Griffin <Tgriffin@rnchq.org>; Sean Cairncross <scairncross@rnchq.org>
Sent: Tue Oct 05 14:51:50 2004
Subject: Cuyahoga Returned List

Received Cuyahoga county returned mailing/inactive CD from McInerney. I extracted from the total returned list (of kick backs from the county's own mailing), the ACT and ACORN #s .

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>

> > <<Inactive Returned List-ACT.xls>> > > <<Inactive Returned List-ACORN.xls>>

>

>

>

RNC 000166

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To: Tim Griffin - Research/Communications; Cuddy Johnson; Blaise Hazelwood - Political; Terry Nelson
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C

RNC 000167

=====
Sign up to be a Bush Volunteer! www.georgewbush.com/volunteer
=====
Caddy Johnson National Field Director,
Bush-Cheney '04
work: 703-647-2733
cell: 202-441-4733
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Cc: 'CMcInerney@rnchq.org'; Tim Griffin; Sean Cairncross
Subject: Re: Cuyahoga Returned List

This is goldmine

RNC 000168

-----Original Message-----

From: Shawn Reinschmidt - Research/Communications
<SReinschmidt@rnchq.org>
To: Dave DenHerder <ddenherder@georgewbush.com>; Caddy Johnson
<cjohnson@georgewbush.com>; Robert Paduchik <bpaduchik@georgewbush.com>;
Christopher Guith <cguith@georgewbush.com>; Mike Magan (E-mail)
<Magan@ohiogop.org>; Kevin Madden <kmadden@georgewbush.com>;
Mauk@ohiogop.org <Mauk@ohiogop.org>
CC: Christopher P. McInerney - Research/Communications
<CMcInerney@rnchq.org>; Tim Griffin <Tgriffin@rnchq.org>; Sean
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From: Christopher Guith
Sent: Tuesday, October 05, 2004 4:59 PM
To: Caddy Johnson; Robert Paduchik; 'Mike Magan'; Dave DenHerder;
Caroline Hunter - Legal
Subject: RE: Cuyahoga Returned List

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RNC 000171

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From: Mike Magan [mailto:Magan@ohiogop.org]
Sent: Tuesday, October 05, 2004 3:19 PM

RNC 000172

Confidential Information -
Subject to Protective Order

To: Robert Paduchik; Cuddy Johnson; Dave DenHerder; Christopher Guith
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RNC 000173

Exhibit 9

washingtonpost.com

Ohio GOP Challenges 35,000 Voters

Saturday, October 23, 2004; Page A09

The Ohio Republican Party challenged the eligibility of 35,000 newly registered voters yesterday, an action that party officials said was unprecedented but necessary to prevent election fraud in a state where polls show President Bush and John F. Kerry in a statistical tie.

Most of the 35,000 voters live in urban, Democratic areas, party spokesman Jason Mauk said. Local party officials, joined by Republican National Committee Chairman Ed Gillespie at a news conference, said the voters were mainly registered by "shadowy" Democratic-leaning groups and were chosen after the GOP sent them mail that was returned as undeliverable.

The party also announced plans to send election observers to nearly 8,000 precincts, drawing on an old, little-used law that allows at-the-poll eligibility challenges.

Democrats immediately denounced the move as a plot to keep voters from the polls. Returned mail or failure to vote in previous elections is not proof that a voter is not eligible, said David Sullivan, the party's voter protection coordinator in Ohio.

-- Jo Becker

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| Will Kerry Win? Take Our Poll And You Can Get A Free \$50 Shopping Card (aff) www.willkerrywin.com | |
| Bush vs. Kerry Vote and select your \$50 gift card. Free with offer signup. 18+ only. www.freegiftworld.com | |

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Last "CC"
Morgan
Silver Dollar

\$5.00



As a 100 Mil
Pure Silver Proof
Limited Release

Exhibit 10

Joseph Sandler

From: Brent Colburn [ColburnC@dnc.org]
Sent: Friday, October 29, 2004 1:55 PM
To: Sandler@sandlerreiff.com
Subject: Fwd:

>>> "" <awurst@ohiodems.org> 10/29/04 1:26 PM >>>
Ohio Republican Party
News Release

For Immediate Release

Contact: Jason Mauk

Friday, October 22, 2004

(614) 228-2481 or (614) 561-4994

**Ohio GOP Continues Effort to Combat Election Fraud
Challenges Filed to Possible Fraudulent Registrations in Multiple Counties**

(Columbus) - The Ohio Republican Party filed official challenges today to approximately 35,000 new registrants in 65 counties where mail was returned as undeliverable by U.S. Postal Service authorities.

"Our goal in filing these pre-election challenges is to protect the integrity of Ohio's electoral process," Chairman Bob Bennett said. "We want to ensure that voters are not disenfranchised by fraud in this election. This is an effort to clarify questionable registrations in advance so they don't become an issue on Election Day."

The challenges are part of an ongoing, aggressive effort by the party to make certain all eligible voters are able to cast their ballot without fear of being disenfranchised. The action comes after widespread reports of voter registration fraud in multiple Ohio counties.

Bennett was joined at a news conference earlier this week by Republican National Committee Chairman Ed Gillespie, where he displayed thousands of pieces of undeliverable mail to newly-registered voters. The mail was returned to the party at an unprecedented rate, three to ten times normal rates for new registrants. An extraordinary high rate of returned mail sent to new registrants by county boards of elections has also been reported by election officials in several Ohio counties.

Gillespie and Bennett highlighted dozens of media reports of suspected fraud across the state, virtually all of it attributable to so-called "527" Democratic front groups such as America Coming Together (ACT), ACORN, and other Democrat-affiliated groups.

The Ohio Republican Party also announced appointment of election observers in all 88 counties who will help to ensure that all eligible voters are able to cast their ballots.

"I am dismayed that the Democratic Party, even while they qualify their own challengers, claim they have no plans to challenge anyone who seeks to vote," Bennett said. "The Democrats presumably will allow Mary Poppins, Dick Tracy or anyone appearing at the polling place to cast a ballot, even if it's a fraudulent vote. That is unconscionable. We will not walk away from our obligations under the law to make certain the election is honest and free of manipulation."

"Democrats outsourced their voter registration activities to shadowy groups, and now they're trying to

10/29/2004

Ignore the fraud some of them committed. They are personally attacking Secretary of State Blackwell for his efforts to ensure a transparent and lawful election. Instead of cooperating with efforts to make certain the election is honest, they are making outrageous claims that we are trying to suppress the vote and disenfranchise eligible voters. I call upon the Democratic Party to stop these divisive tactics, which are useful only to inflame and mislead, and to join us as we try to assure that Ohio's 2004 election will be open, honest and efficient," Bennett said.

#

Jason Mauk
Communications Director
Ohio Republican Party
211 S. Fifth Street
Columbus, OH 43215
(614) 228-2481 office, (614) 561-4994 cell, (614) 228-7230 fax, mauk@oh

Exhibit 11

1
2
3
4
5
6 SUMMIT COUNTY BOARD OF ELECTIONS
7 CHALLENGE HEARINGS
8
9

10 BE IT REMEMBERED, that upon the hearing of
11 the above-entitled matter, held before the
12 Summit County Board of Elections, and commencing
13 on Thursday, the 28th day of October, 2004, at
14 8:24 o'clock a.m., at which time the following
15 proceedings were had.

16 - - -
17
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25

1 APPEARANCES:

2

3 Summit County Board of Elections:

4 Wayne Jones

5 Joseph F. Hutchinson, Jr.

6 Alex R. Arshinkoff

7 Russell M. Pry

8

9 ALSO PRESENT:

10 Sandy J. Rubino, Chief Assistant Prosecutor

11 Bryan C. Williams

12 John Schmidt

13

14

15

16

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20

21

22

23

24

25

08:24:25 1 MR. JONES: I'll call the
08:24:25 2 meeting of Summit County Board of Elections to
08:24:27 3 order. We are waiting on copies of the
08:24:31 4 challenges for the people that are in the room
08:24:33 5 that we have here today. Those are the first
08:24:36 6 people we're going to go with based on how you
08:24:38 7 signed in.
08:24:40 8 And the hearing process will proceed
08:24:42 9 with the challenger coming forward and stating
08:24:45 10 the challenge, and then if the person is here
08:24:49 11 which they are dealing with the evidence then
08:24:54 12 disputes the challenge. I'm waiting for the
08:24:57 13 copies of the challenges for each of the Board
08:25:02 14 members.
08:25:30 15 Are the challengers here, is Barb
08:25:32 16 Miller here? Brian, we're looking for Barb
08:25:50 17 Miller, Lou Wray.
08:26:08 18 MR. WILLIAMS: Which one do you
08:26:11 19 want first?
08:26:12 20 MR. JONES: Barbara Miller is
08:26:13 21 first. Might as well all be in here.
08:27:30 22 First challenge before the Board is
08:27:33 23 the challenge of Catherine Ann Herrold, 238 30th
08:27:40 24 Street Northwest, Barberton. This person is
08:27:42 25 being challenged as unqualified on the grounds

08:27:44 1 the person is not a resident of the precinct.
08:27:49 2 Under penalty of election falsification, Barbara
08:27:53 3 Frye Miller has signed this and she has stated
08:27:58 4 that she knows that this person is not a
08:28:01 5 resident of this precinct.
08:28:03 6 I'd like to call Barbara Miller to
08:28:05 7 the stand to be sworn in.
08:28:08 8 MR. HUTCHINSON: I don't think --
08:28:09 9 Mr. Chairman, with due respect, I do not think
08:28:11 10 that's what the form says. I think it says, "I
08:28:14 11 have reason to believe."
08:28:17 12 MR. JONES: Do you want to come
08:28:18 13 forward and be sworn in, please? Go to the
08:28:27 14 mike, please. Ms. Miller, raise your right
08:28:34 15 hand.
08:28:34 16 BARBARA MILLER
08:28:34 17 of lawful age, a witness herein, having been
08:28:34 18 first duly sworn, as hereinafter certified,
08:28:34 19 testified and said as follows:
08:28:43 20
08:28:43 21 MS. MILLER: Do you want me to
08:28:44 22 stay here or go back?
08:28:45 23 MR. JONES: Yes, please, stay
08:28:47 24 here.
08:28:47 25 MR. PRY: Ms. Miller, you

08:28:49 1 filed a challenge to the voting residence of
08:28:53 2 Catherine Ann Herrold, who lives at 238 30th
08:28:58 3 Street Northwest, Barberton, Summit County,
08:29:00 4 Ohio; is that correct?
08:29:02 5 MS. MILLER: I did.
08:29:02 6 MR. PRY: And have you ever
08:29:03 7 been to that residence?
08:29:04 8 MS. MILLER: No.
08:29:06 9 MR. PRY: Do you know
08:29:06 10 Catherine Ann Herrold?
08:29:08 11 MS. MILLER: No, I don't.
08:29:11 12 MR. PRY: You have indicated
08:29:11 13 in this challenge form that the person -- that
08:29:14 14 you believe that she does not live at that
08:29:16 15 residence; is that correct?
08:29:17 16 MS. MILLER: That's correct.
08:29:19 17 MR. PRY: And what is the
08:29:20 18 basis for you making this challenge?
08:29:23 19 MS. MILLER: That was my
08:29:24 20 impression that these items that I signed were
08:29:27 21 for people whose mail had been undeliverable for
08:29:30 22 several times, and that they did not live at the
08:29:33 23 residence.
08:29:34 24 MR. PRY: Did you personally
08:29:35 25 send any mail to Ms. Herrold?

08:29:37 1 MS. MILLER: No, I did not.
08:29:38 2 MR. PRY: Have you seen any
08:29:39 3 mail that was returned to Ms. Herrold?
08:29:41 4 MS. MILLER: No, I have not.
08:29:42 5 MR. PRY: Do you have any
08:29:42 6 personal knowledge as we stand here today that
08:29:45 7 Ms. Herrold does not live at the address at 238
08:29:48 8 30th Street Northwest?
08:29:50 9 MS. MILLER: Only that which was
08:29:51 10 my impression, that their mail had not been able
08:29:55 11 to be delivered.
08:29:56 12 MR. PRY: And who gave you
08:29:57 13 that impression?
08:29:57 14 MS. MILLER: Attorney Jim Simon.
08:30:01 15 MR. PRY: And what did --
08:30:02 16 MS. MILLER: He's an officer of
08:30:04 17 the party.
08:30:04 18 MR. PRY: An officer of which
08:30:05 19 party?
08:30:06 20 MS. MILLER: Republican party.
08:30:07 21 MR. PRY: Where did you
08:30:08 22 complete this challenge form at?
08:30:10 23 MS. MILLER: My home.
08:30:12 24 MR. PRY: What did Mr. Simon
08:30:14 25 tell you with respect to Ms. Herrold's

08:30:17 1 residence?

08:30:19 2 MS. MILLER: That the mail had

08:30:20 3 come back undeliverable several times from that

08:30:23 4 residence.

08:30:24 5 MR. PRY: And you never saw

08:30:25 6 the returned mail?

08:30:26 7 MS. MILLER: No, I did not.

08:30:27 8 MR. PRY: Now, you've

08:30:29 9 indicated that you signed this based on some

08:30:31 10 personal knowledge.

08:30:34 11 MR. HUTCHINSON: No.

08:30:35 12 MR. ARSHINKOFF: Reason to believe.

08:30:40 13 It says, "I have reason to believe." It says it

08:30:42 14 on the form.

08:30:43 15 MR. JONES: It says, "I hereby

08:30:45 16 declare under penalty of election falsification,

08:30:48 17 that the statements above are true as I verily

08:30:52 18 believe."

08:30:52 19 MR. ARSHINKOFF: It says here, "I

08:30:54 20 have reason to believe."

08:30:55 21 MR. HUTCHINSON: It says what it

08:30:56 22 says.

08:30:57 23 MR. ARSHINKOFF: You want her

08:30:58 24 indicted, get her indicted.

08:30:59 25 MR. PRY: That may be where

08:31:01 1 it goes next.

08:31:02 2 MR. HUTCHINSON: Yeah, give it a

08:31:04 3 try.

08:31:04 4 MR. MORRISON: I'm going to enter

08:31:05 5 an objection.

08:31:07 6 MR. JONES: Can we have your

08:31:09 7 name?

08:31:10 8 MR. MORRISON: Yes. Jack

08:31:11 9 Morrison. I've just been informed by Mr. Pry

08:31:14 10 that an indictment may flow out of this, and

08:31:16 11 therefore I'm instructing Ms. Miller to exercise

08:31:18 12 her privilege against self-incrimination. She

08:31:21 13 will not answer any further questions.

08:31:24 14 MR. PRY: There's no basis

08:31:25 15 for this challenge.

08:31:27 16 MR. JONES: Since she's here,

08:31:28 17 we're going to allow Ms. Herrold share with

08:31:31 18 us -- thank you, Ms. Miller.

08:31:32 19 MS. MILLER: May I sit down?

08:31:34 20 MR. JONES: Yes.

08:31:37 21 MS. KOOSSED: I am Marge Koosed,

08:31:41 22 an attorney assisting --

08:31:41 23 MR. HUTCHINSON: I'm sorry, I didn't

08:31:41 24 hear your name.

08:31:41 25 MS. KOOSSED: Marge Koosed, an

08:31:43 1 attorney assisting, at a volunteer level,
08:31:45 2 Ms. Herrold. We move to dismiss this particular
08:31:47 3 challenge, and for that matter I expect all of
08:31:49 4 the challenges this morning on the grounds that,
08:31:52 5 in fact, a temporary retraining order has been
08:31:56 6 issued by the Cincinnati federal court that, as
08:31:58 7 we understand it, is not being appealed. And at
08:32:01 8 this time there is a motion to amend, or about
08:32:04 9 to be filed, that would include all of the
08:32:06 10 counties in the State of Ohio and all of the
08:32:11 11 hearings of this type that are expected to be
08:32:11 12 conducted over the next day or two.

08:32:13 13 There is, under the Equal Protection
08:32:15 14 Clause and the "Bush versus Gore" decision, a
08:32:17 15 difficulty with treating any counties
08:32:19 16 differently. If some counties are proceeding
08:32:21 17 with these particular types of hearings,
08:32:23 18 challenge hearings, while others are barred from
08:32:25 19 doing so, and while the Republican Party which
08:32:29 20 has filed this suit has decided not to appeal
08:32:32 21 it, then indeed there is an unequal application
08:32:35 22 of Ohio law being conducted if this body and any
08:32:39 23 other Board of Elections shall continue such
08:32:42 24 challenge hearings.

08:32:43 25 We would ask at the very least that

08:32:44 1 there would be a temporary abatement in these
08:32:46 2 until there is a determination from the federal
08:32:48 3 court below, in Cincinnati, as to whether or not
08:32:51 4 that order will be amended to include all of the
08:32:54 5 counties in the state.

08:32:56 6 Furthermore, there is a requirement
08:32:58 7 under state law, which Mr. Pry was referring to,
08:33:02 8 that requires that there be personal knowledge
08:33:04 9 or a good faith belief here. We've just heard
08:33:07 10 that indeed on advice of counsel, Mr. Morrison,
08:33:11 11 the individual seeking this challenge has been
08:33:14 12 instructed not to provide any further
08:33:15 13 information. Clearly there is insufficient
08:33:18 14 information as to Ms. Herrold's not being at
08:33:22 15 that residence.

08:33:22 16 She is in a position to prove that,
08:33:25 17 but, however, there is no need, it would seem to
08:33:28 18 me, for her to do so. There has not been
08:33:31 19 sufficient basis laid out to believe that this
08:33:33 20 individual has any personal knowledge, nor does
08:33:36 21 it appear any basis, if they're not presenting
08:33:38 22 any other witnesses, that there is any reason to
08:33:41 23 believe that she is not at present a resident of
08:33:43 24 that area.

08:33:44 25 I can attest from things that I have

08:33:46 1 examined that she has, in fact, voted at this
08:33:49 2 polling place twice this year. She has been a
08:33:52 3 resident of that home since January, and she has
08:33:55 4 bills and other matters that can prove her
08:33:57 5 residence.

08:33:58 6 MR. HUTCHINSON: Then she ought to
08:34:00 7 be able to vote.

08:34:01 8 MS. HERROLD: Then why am I being
08:34:03 9 challenged?

08:34:04 10 MS. KOOSSED: Then why is she
08:34:05 11 being challenged? We move to dismiss this
08:34:06 12 challenge, and furthermore wish to address the
08:34:09 13 fact that the due process matters and motor
08:34:11 14 voter state law matters identifies --

08:34:13 15 MR. HUTCHINSON: I move to dismiss
08:34:14 16 the challenge.

08:34:15 17 MR. ARSHINKOFF: I second the motion
08:34:16 18 to dismiss the challenge.

08:34:18 19 MS. HERROLD: Can I say
08:34:20 20 something?

08:34:20 21 MR. JONES: Yes, Ms. Herrold,
08:34:22 22 you may.

08:34:22 23 MS. HERROLD: Number one, am I
08:34:24 24 allowed to see proof of the challenge? I
08:34:26 25 understand that that is my right, that there has

08:34:28 1 to be some proof of the challenge as to why I
08:34:31 2 was challenged. There has to be some proof --
08:34:33 3 if mail was, in fact, returned from my address
08:34:36 4 as undeliverable, I should be able to look at
08:34:39 5 it.

08:34:39 6 MR. HUTCHINSON: You should. And if
08:34:40 7 there is mail that came back at the Board of
08:34:45 8 Elections that the Board of Elections --

08:34:46 9 MS. HERROLD: The only thing I
08:34:47 10 can say --

08:34:48 11 MR. HUTCHINSON: Ma'am, let me
08:34:49 12 finish, if I may.

08:34:50 13 If there is, we will certainly
08:34:51 14 provide it to you.

08:34:53 15 MR. JONES: Okay. Ms. Herrold?

08:34:56 16 MS. HERROLD: I refused --

08:34:56 17 MS. KOOSD: At this time it
08:34:56 18 would appear that would be necessary. If we're
08:34:58 19 making a motion to dismiss and I --

08:35:00 20 MR. JONES: She's talking.

08:35:02 21 MS. HERROLD: I refused mail that
08:35:03 22 was sent to me from the Republican headquarters
08:35:07 23 in Akron. That's the only thing I ever got.

08:35:09 24 MR. HUTCHINSON: That may be why you
08:35:11 25 were challenged.

08:35:12 1 MS. HERROLD: But I did not -- it
08:35:12 2 was not undeliverable, it was refused.

08:35:15 3 MR. HUTCHINSON: I mean, ma'am, I
08:35:16 4 don't know why you were challenged.

08:35:17 5 MS. HERROLD: I don't, either.

08:35:19 6 MR. HUTCHINSON: I don't know. But
08:35:19 7 that may be the reason, and it may have come
08:35:21 8 from the Ohio Republican Party and that may have
08:35:24 9 been the reason; I don't know. But whatever we
08:35:26 10 have at the Board of Elections, I think the
08:35:29 11 Board can instruct the staff to provide anything
08:35:33 12 to you if we have anything.

08:35:34 13 MS. HERROLD: I would like to ask
08:35:35 14 for that.

08:35:36 15 MR. HUTCHINSON: And we will do so,
08:35:38 16 and you're entitled to it.

08:35:39 17 And as far as I'm concerned, I don't
08:35:41 18 know what the other members on the Board will
08:35:44 19 vote, but I will vote certainly that you do not
08:35:46 20 have to vote provisional on Tuesday and that the
08:35:50 21 challenge be dismissed as to you.

08:35:52 22 I also would like to ask the Board if
08:35:55 23 we may, Mr. Chairman, I think that her lawyer
08:35:58 24 made a good point with regard to the Bush/Gore
08:36:01 25 decision. I haven't read it for a while. I'd

08:36:04 1 like our counsel to instruct us what to do with
08:36:07 2 respect to that because -- and I'd also like, if
08:36:12 3 you would, ma'am, please, Ms. Koos -- "Koosed"?

08:36:16 4 MS. KOOSSED: Uh-huh.

08:36:17 5 MR. HUTCHINSON: I'm sorry, I don't
08:36:18 6 know you.

08:36:19 7 But I'd like you to also inform the
08:36:22 8 Board about what you learned about the decision
08:36:24 9 from Judge Dlott, I think it is, in Cincinnati,
08:36:27 10 if you could tell us about that.

08:36:30 11 MS. KOOSSED: Mr. Lowry, I think,
08:36:32 12 has been in touch with --

08:36:34 13 MR. JONES: Whoa, whoa, wait.
08:36:36 14 What's in front of the Board right now is
08:36:38 15 hearing.

08:36:39 16 MR. HUTCHINSON: What I want to say
08:36:40 17 is I don't want to have these citizens who have
08:36:42 18 come in to be inconvenienced any more than they
08:36:45 19 already have. If they have proof, I think that
08:36:47 20 they ought to be able to vote and the challenges
08:36:51 21 be dismissed. If they have something that they
08:36:56 22 can show, let's get that part of it over with
08:36:56 23 for those particular voters.

08:36:58 24 With regard to this process, anybody
08:37:01 25 who's not -- who is challenged, or our Board

08:37:03 1 decide one way or the other, if we tied, it
08:37:05 2 doesn't make any difference, the Secretary of
08:37:07 3 State has already permitted everybody to vote as
08:37:10 4 long as -- provisionally as long as they go into
08:37:12 5 the correct precinct.

08:37:14 6 So as far as the people that are
08:37:16 7 here, as far as I'm concerned, if you have a
08:37:18 8 driver's license or something, we can remove
08:37:20 9 them from the challenge list, and I think we can
08:37:22 10 get rid of all of the challenges.

08:37:25 11 MR. ARSHINKOFF: Absolutely.

08:37:27 12 MR. HUTCHINSON: The other thing I
08:37:28 13 would like to say is, if we can, let's talk
08:37:30 14 about whether this hearing should proceed based
08:37:32 15 on the Bush/Gore decision. And I think that's a
08:37:35 16 good point you made.

08:37:36 17 Mr. Chairman, can we do that?

08:37:38 18 MR. JONES: No, we cannot.

08:37:39 19 MR. HUTCHINSON: I don't know why we
08:37:39 20 cannot.

08:37:40 21 MR. JONES: And we'll talk
08:37:40 22 about that in one minute. But the fact of the
08:37:42 23 matter is that a number of people have come here
08:37:44 24 to try to clear their name. They've been
08:37:46 25 challenged as to their residency, a basic right.

08:37:49 1 They've been challenged and they've been --
08:37:52 2 sworn affidavit as they verily believe has been
08:37:54 3 filed against them. And I think they have a
08:37:56 4 right to confront their accusers and they have a
08:38:00 5 right to clear their name.

08:38:03 6 MR. HUTCHINSON: Not if the
08:38:04 7 challenges are dismissed. There's no reason to
08:38:07 8 go forward with the challenges if they have
08:38:10 9 proof. You want to inconvenience these people
08:38:11 10 all day long?

08:38:12 11 MS. HERROLD: You already have.

08:38:14 12 MR. JONES: The challengers --
08:38:18 13 they want to get their name cleared, Joe.

08:38:20 14 MR. HUTCHINSON: Mr. Jones, if they
08:38:21 15 want to get their name cleared, all they have to
08:38:23 16 do is show up.

08:38:24 17 MR. JONES: That's your
08:38:25 18 opinion. The reality is that they've been
08:38:26 19 challenged and a hearing has been scheduled. If
08:38:29 20 they leave, we don't know what they're going to
08:38:31 21 do, and we don't know what the challengers are
08:38:33 22 going to do.

08:38:34 23 MS. HERROLD: The thing is the
08:38:35 24 integrity is being challenged.

08:38:38 25 MR. JONES: We don't know what

08:38:39 1 the evidence is.

08:38:40 2 MS. HERROLD: My integrity was

08:38:42 3 questioned here, my veracity. I've basically

08:38:45 4 been accused of lying.

08:38:47 5 MR. HUTCHINSON: I don't believe you

08:38:48 6 have, ma'am. But if you believe that, that's up

08:38:50 7 to you. But the challenge, in my view, as to

08:38:52 8 you, should be dismissed.

08:38:55 9 MS. KOOSSED: May I just

08:38:56 10 interject?

08:38:57 11 MR. JONES: About what?

08:38:58 12 MS. KOOSSED: About the issue of

08:39:00 13 not only Ms. Herrold, but others who may not be

08:39:03 14 here today on which there are issues of whether

08:39:06 15 this Board is going to go forward on the basis

08:39:07 16 of the concerns I identified earlier.

08:39:10 17 MR. HUTCHINSON: They'll be

08:39:11 18 permitted to vote anyway provisionally. I

08:39:13 19 doesn't matter what we do. We've already been

08:39:14 20 told by the Secretary of State it doesn't matter

08:39:16 21 what --

08:39:17 22 MR. JONES: The reality is,

08:39:18 23 Joe, they have a right to be here and they have

08:39:20 24 a right to vote. And they've been challenged,

08:39:23 25 and I think they have a right for their day in

08:39:25 1 court. This is their day.

08:39:28 2 MR. HUTCHINSON: If it's dismissed,

08:39:29 3 they don't have a right to their day in court.

08:39:31 4 MR. JONES: You're saying

08:39:32 5 provisionally.

08:39:32 6 MR. HUTCHINSON: That's not her.

08:39:35 7 MR. JONES: Well, wait a

08:39:36 8 minute. She's here.

08:39:36 9 MR. HUTCHINSON: Right.

08:39:36 10 MR. JONES: You're saying

08:39:38 11 everybody leaves that submits some sort of

08:39:40 12 evidence and they can vote provisionally.

08:39:40 13 MR. ARSHINKOFF: No. If they have

08:39:41 14 evidence, they'll vote regularly.

08:39:44 15 MR. JONES: We have to vote on

08:39:45 16 that, Mr. Arshinkoff. There's been a challenge

08:39:47 17 before the Board.

08:39:47 18 MS. KOOSSED: May I just add that

08:39:48 19 there are questions about whether any of the

08:39:50 20 other individuals have been given proper notice

08:39:52 21 of this hearing or an opportunity, a reasonable

08:39:54 22 opportunity, to attend this hearing and preserve

08:39:58 23 their right to vote. Furthermore --

08:40:00 24 MR. ARSHINKOFF: That may be, but

08:40:02 25 they were contacted per state law, which says

08:40:04 1 you have to give a general mailing.

08:40:06 2 MS. KOOSSED: Yes. But the

08:40:07 3 problem is, in part, that as we voted, there may

08:40:09 4 be some question in some instances about mail,

08:40:12 5 whether it's being received or not, which

08:40:14 6 creates in that an obvious issue whether or not

08:40:17 7 the notice is, in fact, a reasonable

08:40:20 8 opportunity -- by means of reasonable

08:40:22 9 opportunity. I don't believe there was any

08:40:23 10 publication in the newspaper by the Board of who

08:40:27 11 was in involved in such challenges.

08:40:29 12 There may have been some privacy and

08:40:30 13 other concerns for personal integrity issues for

08:40:34 14 those who might have been identified, but at

08:40:35 15 least it would have been a means of, in fact,

08:40:37 16 making sure that there was adequate notice

08:40:39 17 conveyed.

08:40:40 18 We don't know that there was here,

08:40:41 19 and I object on behalf of those individuals

08:40:45 20 who --

08:40:46 21 MR. JONES: Thank you.

08:40:47 22 MS. KOOSSED: -- were not. And

08:40:47 23 finally, may I just add that the provisional

08:40:49 24 ballot that one is discussing here is not, in

08:40:52 25 fact, a true ballot, and we do not know whether

08:40:54 1 or not those ballots will ever be counted.
08:40:57 2 These individuals have a right to vote, and this
08:40:59 3 proceeding should not be going forward in the
08:41:01 4 wake of the Cincinnati decision.
08:41:03 5 MR. JONES: Thank you.
08:41:04 6 Ms. Herrold, do you have anything
08:41:05 7 else you would like to add?
08:41:06 8 MS. HERROLD: One more thing.
08:41:06 9 MR. JONES: Yes.
08:41:08 10 MS. HERROLD: This is just an
08:41:08 11 aside, but I was challenged as to where I live.
08:41:11 12 The claim was that I do not live where I say I
08:41:15 13 live, yet the challenge was mailed to that
08:41:17 14 address. Now, how would you expect me, if I did
08:41:23 15 not live there, to actually receive this? How
08:41:27 16 would I receive this at 6:00 Tuesday evening?
08:41:32 17 MR. HUTCHINSON: That's a great
08:41:33 18 question.
08:41:34 19 MS. HERROLD: I mean, how would
08:41:34 20 I?
08:41:35 21 MR. HUTCHINSON: Let's assume you
08:41:36 22 didn't live there, if you didn't live there and
08:41:38 23 all we had was that one address, where would you
08:41:40 24 have the staff send it?
08:41:42 25 MS. HERROLD: Well, I don't know.

08:41:43 1 MR. HUTCHINSON: Well, I don't

08:41:44 2 either.

08:41:44 3 MS. HERROLD: But I would think
08:41:46 4 that if you don't think I live there, you would
08:41:48 5 try to find out where I do live.

08:41:50 6 MR. JONES: Would you like to
08:41:51 7 present any other evidence before the -- I just
08:41:53 8 want, for the record, to say I have a
08:41:54 9 registration card from a vehicle that shows that
08:41:57 10 she lives at 238 30th Street. I have a
08:42:00 11 statement from Ameritech that she gets her phone
08:42:03 12 bill -- her phone bill goes to that address. I
08:42:04 13 have from the University of Akron her pay stub
08:42:06 14 that shows that it goes to that address. I have
08:42:10 15 a certificate of registration from the Board
08:42:13 16 that we sent her a card that went to that
08:42:17 17 address.

08:42:17 18 There's a motion. Anything else?

08:42:19 19 MR. PRY: Mr. Jones, for the
08:42:23 20 record, I would just like to apologize to you,
08:42:25 21 making you take a day off of work and having to
08:42:27 22 come down here.

08:42:28 23 MS. HERROLD: Thank you. And the
08:42:29 24 sad part of it is a lot of people cannot take
08:42:32 25 off work to appear before this Board.

08:42:33 1 Fortunately I am in a position that I can be
08:42:36 2 gone from my job. But it's at cost to me,
08:42:39 3 because I do lose money when I don't go to work.
08:42:42 4 MR. JONES: I want to echo the
08:42:43 5 apology.
08:42:44 6 Motion before the Board to dismiss,
08:42:46 7 all in the favor?
08:42:46 8 MR. HUTCHINSON: Aye.
08:42:46 9 MR. ARSHINKOFF: Aye.
08:42:46 10 MR. JONES: Aye.
08:42:46 11 MR. PRY: Aye.
08:42:47 12 MR. JONES: Oppose? You can
08:42:49 13 vote.
08:42:49 14 MS. HERROLD: Now, do I get
08:42:51 15 something that I take with me in case I'm
08:42:53 16 challenged?
08:42:54 17 MR. ARSHINKOFF: You won't be
08:42:56 18 challenged.
08:42:57 19 MS. HERROLD: You all hear that.
08:42:59 20 MS. KOOSSED: This is a decision
08:43:00 21 that is final, correct?
08:43:01 22 MR. JONES: Absolutely.
08:43:03 23 MS. KOOSSED: And this Board is
08:43:04 24 to notify the local polling place that this is
08:43:06 25 entered in her record and is res judicata?

08:43:09 1 MR. JONES: That is correct.

08:43:12 2 MR. ARSHINKOFF: The director and

08:43:13 3 the deputy director, I'll make a motion that

08:43:16 4 they contact the necessary precinct and make

08:43:19 5 sure that the precinct is so notified that

08:43:24 6 Ms. Herrold is well qualified to be a voter.

08:43:27 7 MR. HUTCHINSON: We still haven't

08:43:28 8 had a decision -- Ms. Koosed, I would like to

08:43:31 9 ask you a couple questions --

08:43:33 10 MR. JONES: Hey, Joe, excuse

08:43:35 11 me, she's off --

08:43:36 12 MR. HUTCHINSON: Wait a minute.

08:43:37 13 MR. JONES: It's out of order.

08:43:38 14 It's out of order.

08:43:40 15 MR. HUTCHINSON: I'm going to ask a

08:43:41 16 question. I don't care if it's out of order,

08:43:43 17 Wayne. You can say what's out of order, I don't

08:43:46 18 care what you say.

08:43:46 19 Ms. Koosed, let me ask you a

08:43:49 20 question. You said that you had heard from

08:43:50 21 the --

08:43:50 22 MR. JONES: Sandy?

08:43:52 23 MR. HUTCHINSON: -- you heard from

08:43:53 24 someone about the decision in Cincinnati

08:43:55 25 applying to our county. Can you explain that to

08:43:58 1 me, please?

08:43:59 2 MR. JONES: Please do not
08:44:00 3 respond. We have a prosecutor here that will
08:44:02 4 deal with that issue.

08:44:04 5 MR. RUBINO: I'll try to give
08:44:07 6 the Board the best legal advice I can based on
08:44:09 7 what I know at the time when appropriate.

08:44:11 8 Ms. Koosed, are you here on behalf of
08:44:15 9 anybody else?

08:44:16 10 MS. KOOSSED: I have offered to
08:44:17 11 be a volunteer lawyer on behalf of any -- and
08:44:20 12 assist any voters who have been challenged in
08:44:22 13 this process. I actually am a law professor at
08:44:26 14 the University of Akron, and Ms. Herrold and I
08:44:29 15 have had some contact with one another, so when
08:44:32 16 I saw her here, I went immediately to assist
08:44:34 17 her.

08:44:35 18 MR. RUBINO: If you're going to
08:44:36 19 call her, you want to call her as a witness,
08:44:38 20 she's going to have to be sworn in unless she's
08:44:41 21 representing somebody in the context of -- an
08:44:43 22 adversarial.

08:44:45 23 MR. HUTCHINSON: She's representing
08:44:46 24 all these people?

08:44:48 25 MR. JONES: She's not

08:44:49 1 representing them.

08:44:50 2 MR. RUBINO: She just said --

08:44:51 3 didn't say that. She said she's here,

08:44:54 4 available.

08:44:54 5 MS. KOOSSED: I've offered to

08:44:54 6 assist anyone --

08:44:54 7 MR. HUTCHINSON: All right. Then I

08:44:56 8 also asked her questions earlier, she did

08:44:58 9 represent the prior challengee, voter, and I

08:45:04 10 asked a couple questions. One is where did she

08:45:07 11 hear this issue about the lawsuit applying to

08:45:10 12 Summit County?

08:45:11 13 MR. RUBINO: Right.

08:45:12 14 MR. HUTCHINSON: Do you know

08:45:13 15 anything about that?

08:45:13 16 MR. RUBINO: I know a little

08:45:14 17 bit, eight pages' worth. I'm waiting for the

08:45:18 18 balance of the fax.

08:45:19 19 MR. HUTCHINSON: With respect to it

08:45:21 20 applying to Summit County?

08:45:22 21 MR. RUBINO: I don't know.

08:45:24 22 MR. HUTCHINSON: She said that there

08:45:25 23 will be something heard later that may add

08:45:27 24 Summit County to the list. She also invoked

08:45:33 25 "Bush v. Gore," which -- and I believe she

08:45:35 1 invoked it properly, that equal protection with
08:45:39 2 respect to counties treating these sorts of
08:45:42 3 issues differently, I think that's a legal issue
08:45:44 4 she's raised that may be determinative, in my
08:45:50 5 view, as to whether or not these proceedings
08:45:51 6 should continue.

08:45:52 7 Now, I want to ask her a couple
08:45:55 8 questions about that. If she doesn't want to
08:45:58 9 answer them, that's fine with me. But I think
08:46:03 10 you as our counsel, I think, with all due
08:46:04 11 respect, I think what we need to do is deal with
08:46:06 12 those two issues.

08:46:07 13 MR. RUBINO: Okay. But what I
08:46:09 14 hear going on, though, I think you guys should
08:46:11 15 proceed with regular order. Okay? So you
08:46:15 16 should ask the Chairman to be recognized, and
08:46:20 17 then you say that you would like to call her
08:46:23 18 up --

08:46:23 19 MR. HUTCHINSON: He's already said I
08:46:24 20 can't.

08:46:25 21 MR. JONES: It's out of order.

08:46:26 22 MR. HUTCHINSON: It is not out of
08:46:27 23 order. I asked her earlier.

08:46:29 24 MR. RUBINO: Let me ask,

08:46:31 25 Ms. Koosed, are you going to be -- well, do you

08:46:33 1 know for a fact you're going to be representing
08:46:35 2 anybody else here right now?

08:46:37 3 MS. KOOSSED: There have been one
08:46:38 4 or two persons who have approached me about that
08:46:40 5 request, and I would be happy to do so.

08:46:44 6 MR. RUBINO: When you get to
08:46:45 7 them, why don't you ask her in the context.

08:46:47 8 MR. HUTCHINSON: Fine.
08:46:48 9 Mr. Chairman, that's fine with me.

08:46:50 10 MR. JONES: Thank you.
08:46:50 11 The next challenge is Joseph
08:46:57 12 McLaughlin. Mr. McLaughlin has been
08:47:04 13 challenged --

08:47:09 14 MR. McLAUGHLIN: I actually got two
08:47:10 15 challenges, one for 8:00 and 11:00.

08:47:15 16 MR. JONES: You've been
08:47:16 17 challenged twice?

08:47:19 18 MR. McLAUGHLIN: Yes. The
08:47:20 19 challenges were by the same person with
08:47:22 20 different handwriting on both challenges and two
08:47:25 21 different signatures.

08:47:26 22 MR. JONES: Eighty-six.
08:47:30 23 MR. WILLIAMS: Eighty-six wasn't
08:47:31 24 on your list. It's right here. (Indicating.)
08:47:51 25 MR. HUTCHINSON: Barbara Miller.

08:48:02 1 MR. JONES: Mr. McLaughlin,
08:48:04 2 before you come forward, I'd like to bring
08:48:07 3 Ms. Miller up.
08:48:10 4 Mr. Morrison, are you saying
08:48:11 5 Ms. Miller refuses to testify?
08:48:13 6 MR. MORRISON: Yes, based on the
08:48:14 7 threat that was made by Mr. Pry.
08:48:17 8 MR. JONES: I don't believe
08:48:17 9 there was a threat made.
08:48:19 10 MR. MORRISON: Well, the record
08:48:19 11 will stand for what it says. Based upon the
08:48:22 12 overt threat by Mr. Pry, I'm not going to permit
08:48:25 13 Barb Miller to stand and answer questions before
08:48:27 14 this body.
08:48:29 15 So as to any other challenges that
08:48:32 16 you might find that she signed off on, she will
08:48:35 17 not be testifying today based upon the threat.
08:48:39 18 MR. JONES: What threat are you
08:48:41 19 talking about?
08:48:42 20 MR. MORRISON: Mr. Pry's threat
08:48:43 21 that he may look for indictments.
08:48:45 22 MR. JONES: With regard to
08:48:47 23 what?
08:48:47 24 MR. MORRISON: You have to ask
08:48:48 25 Mr. Pry.

08:48:53 1 MR. ARSHINKOFF: Oh, this is so much
08:48:54 2 fun, I can't stand it.
08:48:59 3 MR. JONES: Mr. McLaughlin?
08:49:01 4 MR. McLAUGHLIN: Yes.
08:49:01 5 MR. JONES: Please come
08:49:02 6 forward. We have an affidavit that has been
08:49:06 7 declared under penalty of election falsification
08:49:08 8 that the statements were true as she verily
08:49:11 9 believed, by Barbara Miller, that you do not
08:49:13 10 reside at 1484 Front Street, Apartment 3,
08:49:18 11 Cuyahoga Falls, Ohio. And I guess you've been
08:49:20 12 challenged twice, you say?
08:49:22 13 MR. McLAUGHLIN: Yes.
08:49:22 14 MR. JONES: You received two
08:49:23 15 challenges?
08:49:24 16 MR. McLAUGHLIN: Yes, one for the
08:49:25 17 8:00 hour, one for the 11:00 hour.
08:49:26 18 MR. JONES: So you've been
08:49:27 19 doubly challenged?
08:49:28 20 MR. McLAUGHLIN: Yes. Two different
08:49:29 21 handwritings on both and two different
08:49:31 22 signatures on both --
08:49:35 23 MR. JONES: Okay. Would you
08:49:35 24 like to share?
08:49:36 25 MR. McLAUGHLIN: -- by the same

08:49:37 1 person.

08:49:38 2 MR. JONES: Would you like to
08:49:38 3 share -- are you represented, by the way?

08:49:40 4 MR. McLAUGHLIN: No.

08:49:41 5 MR. JONES: Feel free to go
08:49:42 6 forward and share with the committee -- oh, I'm
08:49:45 7 sorry. Excuse me. I've got swear you in.
08:49:49 8 Raise your right arm, please.

08:49:49 9 JOSEPH McLAUGHLIN
08:49:49 10 of lawful age, a witness herein, having been
08:49:49 11 first duly sworn, as hereinafter certified,
08:49:56 12 testified and said as follows:

08:49:56 13 MR. JONES: Go ahead.

08:49:58 14 MR. McLAUGHLIN: Well, I got this on
08:50:00 15 Tuesday, and I didn't have enough time really
08:50:03 16 to -- luckily, as the previous person, I'm in a
08:50:07 17 position where I can actually take off work; I'm
08:50:10 18 still losing money. And I'm a veteran, and I've
08:50:13 19 been living here since January, and I've been
08:50:15 20 living in Summit County for two years. I think
08:50:18 21 that this is outrageous.

08:50:21 22 MR. ARSHINKOFF: You live there?

08:50:22 23 MR. McLAUGHLIN: Yes.

08:50:23 24 MR. ARSHINKOFF: And you have a
08:50:23 25 driver's license?

08:50:24 1 MR. McLAUGHLIN: Yes. You have a
08:50:26 2 copy of it there.
08:50:27 3 MR. ARSHINKOFF: I move we reject
08:50:29 4 the challenge.
08:50:31 5 MR. HUTCHINSON: Second.
08:50:33 6 MR. McLAUGHLIN: Do I have to be
08:50:34 7 back here at 11:00?
08:50:37 8 MR. PRY: No. There is
08:50:37 9 absolutely no evidence at this point in time.
08:50:39 10 The challenger has refused to present any
08:50:42 11 evidence with respect to why you are even here
08:50:44 12 today, sir. Again, I wish to apologize.
08:50:47 13 If people are going to file
08:50:48 14 challenges and have no evidence, no personal
08:50:50 15 evidence whatsoever to bring before this Board,
08:50:52 16 it is an absolute travesty of this system and
08:50:57 17 why we are here, and it attacks the fundamental
08:51:01 18 right of people's right to vote, and I apologize
08:51:03 19 to you, sir. /
08:51:03 20 MR. JONES: Mr. McLaughlin, I
08:51:05 21 too would like to apologize. I'm appalled
08:51:08 22 what's gone on here, the fact that you're a
08:51:10 23 veteran and you've taken time off work.
08:51:14 24 Motion on the table, all in favor to
08:51:15 25 dismiss the challenges against Mr. McLaughlin.

08:51:15 1 MR. HUTCHINSON: Aye.
08:51:15 2 MR. ARSHINKOFF: Aye.
08:51:15 3 MR. JONES: Aye.
08:51:15 4 MR. PRY: Aye.
08:51:18 5 MR. JONES: Oppose? The ayes
08:51:19 6 have it. You will not be voting provisional,
08:51:24 7 you will be voting regular.
08:51:24 8 MR. ARSHINKOFF: And we will make
08:51:27 9 sure that your pole workers, the booth workers
08:51:29 10 will know and you will be able to vote.
08:51:31 11 MR. McLAUGHLIN: Thank you very
08:51:32 12 much.
08:51:33 13 MR. ARSHINKOFF: Thank you, sir.
08:51:34 14 MR. HUTCHINSON: Thank you.
08:51:35 15 MR. JONES: Barbara Jean
08:51:36 16 DeWilde, number 177. Barbara Jean DeWilde?
08:51:48 17 Thank you. I just want to make sure you're
08:51:51 18 here. You've been challenged by Lou Wray, 263
08:51:55 19 Don's Court --
08:51:56 20 Yes sir?
08:51:56 21 MR. McLAUGHLIN: Do you have my
08:51:57 22 original paperwork?
08:51:58 23 MR. JONES: I do. Do you need
08:52:00 24 that?
08:52:00 25 MR. McLAUGHLIN: Yes.

08:52:06 1 MR. RUBINO: Mr. Jones, you'll
08:52:07 2 need to have a copy of that for the record.
08:52:10 3 MR. JONES: Okay. We will make
08:52:16 4 copies for you and get him --
08:52:19 5 MR. PRY: Let's do that and
08:52:20 6 let him get out of here so he can go back to
08:52:23 7 work. Make sure he gets his originals.
08:52:28 8 MR. JONES: Just one second.
08:52:30 9 You've been challenged by Lou Wray --
08:52:32 10 Barbara Jean "DeWilde," is that it?
08:52:36 11 MS. DeWILDE: Uh-huh.
08:52:37 12
08:52:37 13 MR. JONES: -- that you're not
08:52:38 14 a resident of 3587 Kent Road, Stow, Ohio. Under
08:52:42 15 penalty of election falsification, Mr. Wray has
08:52:46 16 signed this saying that he verily believes -- is
08:52:51 17 Mr. Wray here?
08:52:52 18 MR. MORRISON: Yes, he is. He has
08:52:54 19 responded to the subpoena, he is present.
08:52:56 20 MR. JONES: Mr. Wray, would you
08:52:57 21 like to come forward? Would you raise your
08:53:02 22 right arm, sir?
08:53:03 23 LOU WRAY
08:53:03 24 of lawful age, a witness herein, having been
08:53:03 25 first duly sworn, as hereinafter certified,

08:53:11 1 testified and said as follows:

08:53:11 2 MR. JONES: Mr. Wray, you have
08:53:12 3 filed a challenge against Barbara Jean DeWilde
08:53:16 4 that she is not a resident and she should be
08:53:18 5 removed from the registration in precinct E,
08:53:23 6 First Ward Stow; is that correct?

08:53:24 7 MR. WRAY: Yes.

08:53:27 8 MR. JONES: Mr. Wray, do you
08:53:28 9 have knowledge that Ms. Barbara Jean DeWilde
08:53:30 10 does not live at that residence?

08:53:32 11 MR. WRAY: No, I don't.

08:53:33 12 MR. JONES: You do not have
08:53:34 13 knowledge?

08:53:34 14 MR. WRAY: I do not have
08:53:35 15 personal knowledge, sir.

08:53:37 16 MR. JONES: What knowledge do
08:53:37 17 you have, sir?

08:53:38 18 MR. WRAY: Just the
08:53:44 19 information from the Summit County Board of
08:53:49 20 Elections. When they tried to notify her with
08:53:52 21 registration materials, they were returned by
08:53:54 22 the U.S. Post Office as being undeliverable, and
08:53:58 23 on that basis, we have to -- at least I assumed
08:54:03 24 that she is not qualified to vote with that
08:54:10 25 address since she showed it on the election

08:54:14 1 records.

08:54:14 2 MR. PRY: Sir, what did you

08:54:16 3 receive from the Board of Elections?

08:54:18 4 MR. WRAY: I'm sorry?

08:54:20 5 MR. PRY: What did you

08:54:20 6 receive from the Board of Elections?

08:54:20 7 MR. WRAY: I'm sorry.

08:54:20 8 MR. PRY: What did you

08:54:22 9 receive from the Board of Elections that was

08:54:23 10 returned?

08:54:25 11 MR. JONES: Did you see the

08:54:26 12 return from the Board of Elections?

08:54:28 13 MR. WRAY: No.

08:54:29 14 MR. ARSHINKOFF: Mr. Wray, were you

08:54:30 15 relying on information that you had heard from

08:54:34 16 the Ohio Republican Party that they thought that

08:54:36 17 this woman was unqualified to vote because she

08:54:39 18 didn't live there?

08:54:40 19 MR. WRAY: No. I have read

08:54:43 20 and heard of a lot of, so-called shenanigans

08:54:49 21 going on regarding registration. My own

08:54:52 22 personal feeling is that this is a privilege

08:54:55 23 that all citizens have to vote, and they really

08:55:00 24 must be qualified and vote in the area in which

08:55:08 25 their residence is located.

08:55:10 1 MR. ARSHINKOFF: But, Mr. Wray, that
08:55:11 2 information came to you based on information
08:55:14 3 compiled by the Ohio Republican Party?
08:55:16 4 MR. WRAY: Yes.
08:55:16 5 MR. JONES: Who did you talk to
08:55:18 6 at the Ohio Republican Party, Mr. Wray?
08:55:20 7 MR. WRAY: I'm sorry?
08:55:21 8 MR. JONES: Who did you speak
08:55:22 9 to at the Ohio Republican Party?
08:55:25 10 MR. WRAY: I didn't speak to
08:55:26 11 anyone at the Ohio Republican Party.
08:55:29 12 MR. JONES: You said you got
08:55:29 13 the information from the Ohio Republican Party.
08:55:32 14 Where did you get the information from?
08:55:34 15 MR. WRAY: I got my
08:55:35 16 information from the Summit County Republican
08:55:40 17 headquarters.
08:55:41 18 MR. JONES: Who did you get it
08:55:42 19 from at the Republican headquarters?
08:55:46 20 MR. WRAY: A gentleman by the
08:55:47 21 name of Mike who called and explained the
08:55:49 22 situation where certain voters were going to be
08:55:54 23 challenged because of their registration
08:55:58 24 materials being returned as undeliverable by the
08:56:02 25 post office.

08:56:02 1 MR. JONES: Did you ask Mike
08:56:04 2 why he didn't sign the challenge since he had
08:56:07 3 knowledge, why he asked you to sign it?
08:56:12 4 MR. WRAY: Again, I didn't
08:56:13 5 hear.
08:56:14 6 MR. JONES: Why would he ask
08:56:16 7 you to sign it if you didn't have knowledge?
08:56:19 8 Why did he ask you to sign it? Why didn't he
08:56:21 9 sign it if he had knowledge?
08:56:21 10 MR. WRAY: If he asked if I
08:56:23 11 would be willing to do that, and I said as a
08:56:25 12 responsible citizen, I would, because I cherish
08:56:28 13 the privilege of voting and feel that any voter
08:56:31 14 must be qualified.
08:56:33 15 I worked for the Board of Elections
08:56:34 16 here for a number of years, and I know that they
08:56:38 17 bend over backwards and do an excellent job on
08:56:40 18 trying to get all voters registered. And I'm
08:56:47 19 sure that these people have been given ample
08:56:50 20 opportunity to change their address and notify
08:56:51 21 the Board of their residence. And if they don't
08:56:58 22 care enough about their voting privilege to do
08:57:02 23 that, I feel they should --
08:57:05 24 MR. JONES: Mr. Wray, you've
08:57:05 25 made a determination that they don't care enough

08:57:07 1 about it. How do you make that determination?
08:57:09 2 MR. WRAY: I just feel
08:57:11 3 that --
08:57:11 4 MR. JONES: Just because Mike
08:57:12 5 at the Republican Party said that they didn't
08:57:15 6 get returned mail, you're saying that's the
08:57:18 7 reason they should not have a right to vote?
08:57:21 8 MR. WRAY: No. I -- my own
08:57:24 9 personal feeling, I feel strongly enough that it
08:57:29 10 is up to the voter to exercise the privilege of
08:57:33 11 voting by keeping the Board of Elections
08:57:38 12 informed of where they reside and where they
08:57:40 13 should vote.
08:57:42 14 MR. JONES: Mr. Wray, one more
08:57:44 15 question, and then go ahead, Mr. Pry.
08:57:46 16 How many of these did you sign?
08:57:49 17 MR. WRAY: I probably signed
08:57:50 18 about 200.
08:57:51 19 MR. JONES: You signed 200 of
08:57:53 20 these. Do you know any of the people that you
08:57:55 21 signed for? Do you know any of them personally?
08:57:58 22 MR. WRAY: No, I don't.
08:57:59 23 MR. JONES: Have you ever
08:58:00 24 visited any of their residences to know that
08:58:01 25 they not live there?

08:58:03 1 MR. WRAY: No.

08:58:03 2 MR. JONES: Did you ever see

08:58:04 3 any mail that was delivered undeliverable to any

08:58:06 4 of the addresses you signed?

08:58:07 5 MR. WRAY: No.

08:58:08 6 MR. JONES: And you swore to

08:58:08 7 this statement that you believe they are not

08:58:10 8 residents?

08:58:10 9 MR. WRAY: Right.

08:58:11 10 MR. ARSHINKOFF: That he had reason

08:58:13 11 to believe. It says here, "I have reason to

08:58:16 12 believe." His reason to believe is that the

08:58:19 13 Ohio Republican Party thought he wasn't

08:58:23 14 registered.

08:58:23 15 MR. JONES: He never met with

08:58:24 16 the Ohio Republican Party, Mr. Arshinkoff.

08:58:28 17 MR. ARSHINKOFF: I think they

08:58:29 18 compiled the list

08:58:31 19 MR. JONES: Obviously the

08:58:32 20 Summit County Republican Party is the one that

08:58:34 21 contacted him.

08:58:35 22 MR. ARSHINKOFF: On behalf of the

08:58:37 23 Ohio Republican Party.

08:58:38 24 MR. JONES: Mr. Pry?

08:58:39 25 MR. PRY: Mr. Wray, do you

08:58:41 1 have any mail here today on Barbara J. DeWilde
08:58:45 2 that was returned?
08:58:47 3 MR. WRAY: What?
08:58:49 4 MR. PRY: Do you have in your
08:58:51 5 possession any returned mail from Barbara Jean
08:58:53 6 DeWilde?
08:58:54 7 MR. WRAY: No.
08:58:55 8 MR. PRY: Did you ever see
08:58:55 9 any piece of mail that was returned that went to
08:58:58 10 Barbara Jean DeWilde's address?
08:59:00 11 MR. WRAY: No.
08:59:04 12 MR. PRY: Did you see any
08:59:05 13 records from the Summit County Board of
08:59:08 14 Elections that showed that Barbara Jean DeWilde
08:59:10 15 does not live at the residence where you're
08:59:13 16 challenging her at?
08:59:14 17 MR. WRAY: No.
08:59:14 18 MR. PRY: Mr. Chairman, I
08:59:16 19 would move that based on the testimony of
08:59:18 20 Mr. Wray, that this challenge be dismissed for
08:59:20 21 no evidence whatsoever with respect to the
08:59:22 22 filing of this challenge.
08:59:26 23 MR. JONES: I will second the
08:59:27 24 motion. Motion on the table to dismiss the
08:59:29 25 challenge based on no evidence. All in favor,

08:59:33 1 aye?

08:59:33 2 MR. HUTCHINSON: Aye.

08:59:33 3 MR. ARSHINKOFF: Aye.

08:59:33 4 MR. JONES: Aye.

08:59:33 5 MR. PRY: Aye.

08:59:34 6 MR. JONES: Oppose? Thank you.

08:59:37 7 Just for the record, I want to thank

08:59:39 8 and apologize to Barbara Jean DeWilde for coming

08:59:44 9 down today. We apologize. If you would like,

08:59:47 10 since you've come here, if you want your day in

08:59:48 11 court, you want to say something, I would be

08:59:50 12 happy to allow you to say something.

08:59:53 13 MS. DeWILDE: I would, and he

08:59:54 14 would like to say something, also.

08:59:56 15 Can I see -- I just, I would like to

09:00:02 16 say that I am appalled that these challenges

09:00:05 17 have made a mockery of America's free election

09:00:08 18 process, and my case being dropped is not enough

09:00:14 19 for those who could not be here today.

09:00:17 20 MR. JONES: Thank you.

09:00:18 21 MR. PRY: We apologize for

09:00:20 22 making you come here.

09:00:21 23 MR. JONES: We apologize.

09:00:23 24 MR. KLINGSHIRN: Barbara has asked

09:00:24 25 me to assist her. My name is Neil Klingshirn.

09:00:27 1 I'm an attorney, I'm a volunteer with the Voter
09:00:31 2 Protection Coalition.
09:00:31 3 MR. JONES: The case is
09:00:32 4 dismissed, sir. Thank you.
09:00:35 5 MR. KLINGSHIRN: You're welcome.
09:00:38 6 MS. KOMAROMY: But will she get
09:00:40 7 the same --
09:00:40 8 MR. JONES: She gets the full
09:00:42 9 rights to vote.
09:00:43 10 MS. KOMAROMY: Will you also
09:00:43 11 notify her precinct?
09:00:45 12 MR. JONES: Yes. We'll make a
09:00:47 13 motion --
09:00:48 14 MR. PRY: She may not be
09:00:49 15 challenged again at the precinct.
09:00:52 16 MS. KOMAROMY: No. She may not be
09:00:54 17 challenged, or she will not be challenged?
09:00:57 18 MR. PRY: She will not be
09:00:59 19 challenged. She will not be challenged.
09:01:04 20 MR. JONES: We don't think.
09:01:06 21 MS. KOMAROMY: No. We want an
09:01:07 22 official proof that she will not be challenged
09:01:08 23 when she goes to vote at the election.
09:01:09 24 MR. KLINGSHIRN: Is there a journal
09:01:10 25 entry, something --

09:01:11 1 MR. JONES: We will get her
09:01:12 2 something.
09:01:13 3 MS. KOMAROMY: We want
09:01:14 4 documentation from this hearing that she will
09:01:15 5 not be challenged at the election on Tuesday.
09:01:20 6 MR. KLINGSHIRN: A final order.
09:01:21 7 MR. HUTCHINSON: What do you suggest
09:01:23 8 we do? That's not a bad idea.
09:01:25 9 MR. PRY: I make a motion
09:01:27 10 that we authorize the director and deputy
09:01:29 11 director to prepare basically a form to give to
09:01:32 12 these people who have been challenged, the
09:01:34 13 outcome, a summary outcome of the hearing
09:01:37 14 procedure so that when they -- it will be
09:01:41 15 delivered to them in some fashion so that on
09:01:44 16 election day they will have a decision from this
09:01:46 17 Board in their possession indicating that the
09:01:48 18 challenge had been made, that it had been
09:01:50 19 resolved and therefore they are exempt from any
09:01:53 20 further challenges at the pole.
09:01:55 21 MR. HUTCHINSON: Second.
09:01:56 22 MR. JONES: There is a second.
09:01:57 23 All in favor?
09:01:57 24 MR. HUTCHINSON: Aye.
09:01:57 25 MR. ARSHINKOFF: Aye.

09:01:57 1 MR. JONES: Aye.
09:01:58 2 MR. PRY: Aye.
09:01:59 3 MS. KOMAROMY: I have a question.
09:02:00 4 If you plan on mailing those and this whole
09:02:05 5 thing is about undeliverable mail, how do you
09:02:08 6 count on these people receiving that notice?
09:02:11 7 MR. HUTCHINSON: Well, maybe the
09:02:11 8 thing to do is, Russ, instead of having those at
09:02:12 9 the precinct -- I mean, she's got a good point
09:02:14 10 there.
09:02:15 11 MR. JONES: We will make you a
09:02:16 12 copy that you can pick up here, we will mail it,
09:02:18 13 and we'll even have a runner deliver these.
09:02:21 14 MR. ARSHINKOFF: I think a better
09:02:22 15 move is to attach it to the voter card at each
09:02:28 16 voting booth.
09:02:29 17 MR. JONES: But I think they
09:02:31 18 want proof when they walk in. They don't want
09:02:32 19 to take the chance that --
09:02:32 20 UNIDENTIFIED: I want possession
09:02:33 21 of it.
09:02:34 22 MR. ARSHINKOFF: You can have that,
09:02:35 23 too.
09:02:36 24 MR. HUTCHINSON: We can do it all
09:02:38 25 three ways.

09:02:39 1 MR. JONES: Those in the
09:02:42 2 audience, just so you know, this is
09:02:44 3 unprecedented, we haven't had this type of thing
09:02:47 4 before, so we're kind of dealing with this on a
09:02:50 5 new issue basis.

09:02:50 6 MR. HUTCHINSON: We're treading new
09:02:50 7 ground here.

09:02:51 8 MR JONES: Treading new ground
09:02:52 9 here.

09:02:54 10 The next challenge before the Board
09:02:57 11 is Ervin Johnson. Mr. Johnson, just one second.
09:03:03 12 You've been challenged by Barbara Frye Miller,
09:03:07 13 who said that you are not a resident of
09:03:09 14 Precinct 2.

09:03:14 15 MR. PRY: Do we have Ervin
09:03:15 16 Johnson?

09:03:17 17 MR. WILLIAMS: Not in the first
09:03:18 18 pack, unless they supplemented it. 213, that
09:03:25 19 wasn't pulled.

09:03:26 20 MR. PRY: I thought we were
09:03:28 21 checking these people in and pulling them out
09:03:29 22 before they came in?

09:03:30 23 MR. WILLIAMS: Right. But somehow
09:03:33 24 they're getting to the chair before -- the Board
09:03:40 25 members have --

09:03:41 1 MR. JONES: We'll come back to
09:03:42 2 you.
09:03:44 3 Mr. Horam, sorry, just one second,
09:03:47 4 sir. You've been challenged by Barbara Frye
09:03:52 5 Miller.
09:03:53 6 MR. HORAM: Twice.
09:03:54 7 MR. JONES: Twice. You've
09:03:57 8 been -- Ms. Miller has sworn under penalty of
09:04:02 9 election falsification that she believes you are
09:04:04 10 not a resident of Precinct 2C in Twinsburg.
09:04:09 11 Ms. Miller -- Mr. Morrison, are you
09:04:11 12 still taking the Fifth Amendment?
09:04:13 13 MR. MORRISON: Yes. That would be
09:04:15 14 true as to any that involve Barb Miller at this
09:04:17 15 point.
09:04:18 16 MR. JONES: Okay.
09:04:19 17 MR. HUTCHINSON: Did you say as to
09:04:21 18 any that involve Barb Miller, Mr. Morrison?
09:04:23 19 MR. MORRISON: Yes, because of the
09:04:24 20 remarks.
09:04:25 21 MR. JONES: How many would that
09:04:27 22 be, Mr. Morrison?
09:04:29 23 MR. MORRISON: I don't know the
09:04:29 24 number offhand.
09:04:32 25 MR. HUTCHINSON: Mr. Jones, I'm

09:04:33 1 sorry, I wasn't totally listening. Are we on a
09:04:36 2 particular challenge.

09:04:38 3 MR. JONES: Yes. We are on
09:04:39 4 Errol Herron.

09:04:39 5 MR. HORAM: My actual name is
09:04:40 6 Horam, H-o-r-a-m. And if you're going to spend
09:04:44 7 the time to send me those challenges, you could
09:04:47 8 at least get my name spelled correctly.

09:04:49 9 I came to this country because this
09:04:50 10 is a great country and I --

09:04:52 11 MR. JONES: Mr. Horam, I need
09:04:55 12 to swear you in first, please.

09:04:55 13 ERROL HORAM
09:04:55 14 of lawful age, a witness herein, having been
09:04:55 15 first duly sworn, as hereinafter certified,
09:05:03 16 testified and said as follows:

09:05:03 17 MR. JONES: Please proceed.

09:05:06 18 MR. HORAM: I got two
09:05:07 19 challenges here from Summit County, and my name
09:05:09 20 is not properly spelled on here, as per my
09:05:14 21 registration card. This is my registration card
09:05:17 22 with the proper spelling of my name.
09:05:20 23 (Indicating.)

09:05:20 24 MR. JONES: This will -- just
09:05:22 25 one second. Before me is a registration card

09:05:27 1 from the Board of Elections --

09:05:28 2 MR. ARSHINKOFF: I move we dismiss.

09:05:30 3 MR. JONES: -- spelling his

09:05:31 4 name H-o-r-a-m, 9358 Andrew Drive, Twinsburg,

09:05:36 5 Ohio.

09:05:36 6 MR. ARSHINKOFF: I move we dismiss

09:05:38 7 the challenges against this gentleman, and I

09:05:41 8 give you my apology and the apology of the Board

09:05:44 9 of Elections.

09:05:46 10 MR. HUTCHINSON: Second.

09:05:47 11 MR. JONES: Before we do that,

09:05:48 12 would you like to say anything.

09:05:50 13 MR. HORAM: No. There are

09:05:50 14 other people waiting to go back to work.

09:05:55 15 MR. JONES: I again --

09:05:57 16 MR. HORAM: I'm very

09:05:58 17 disappointed with the Republican Party.

09:06:00 18 MR. HUTCHINSON: I understand, sir.

09:06:01 19 MR. JONES: I apologize to you,

09:06:02 20 sir, for having to come down here and be

09:06:04 21 subjected to this.

09:06:06 22 The motion on the table is to dismiss

09:06:07 23 the challenges of Mr. Horam.

09:06:11 24 MR. PRY: Thank you, sir.

09:06:12 25 MR. JONES: All in favor?

09:06:12 1 MR. HUTCHINSON: Aye.
09:06:12 2 MR. ARSHINKOFF: Aye.
09:06:12 3 MR. JONES: Aye.
09:06:13 4 MR. PRY: Aye.
09:06:13 5 MR. JONES: Oppose?
09:06:14 6 MR. HUTCHINSON: Mr. Jones, I have a
09:06:16 7 motion to dismiss all of the challenges made by
09:06:19 8 Barbara Miller and Lou Wray.
09:06:23 9 MR. JONES: Just one second.
09:06:26 10 Motion --
09:06:26 11 MS. MCCRANEY: We've been here
09:06:27 12 since a quarter till eight, and I would like you
09:06:31 13 to not do that. And I'm not sure how you're
09:06:34 14 calling, whether you're calling in alphabetical
09:06:37 15 order or not, but I do have to go to work, so if
09:06:40 16 you could call my husband so we can move on,
09:06:42 17 please, and get this over with. I'm sorry, this
09:06:45 18 is -- I'm sorry it's inconveniencing you, but
09:06:47 19 it's inconvenienced over the 200 people that are
09:06:49 20 being -- as I heard it this morning, about 200
09:06:53 21 people an hour that you all have here to come to
09:06:58 22 particular hearings, and so the McCraney family
09:07:01 23 is here and we would like to get ours over with.
09:07:03 24 MR. JONES: Just for the
09:07:04 25 record, that was done by the director of the

09:07:06 1 Board of Elections.

09:07:07 2 MS. McCRAVEY: Okay. But I need

09:07:07 3 to go to work.

09:07:09 4 MR. JONES: We had talked about

09:07:10 5 doing this 20 to an hour, but he chose to do 250

09:07:13 6 an hour.

09:07:16 7 MS. McCRAVEY: The McCraveys are

09:07:16 8 here, and Lisa McCravey needs to go to work.

09:07:19 9 MR. HUTCHINSON: Mr. Chairman, I

09:07:20 10 made a motion.

09:07:21 11 MR. JONES: Questions on the

09:07:22 12 motion?

09:07:23 13 MR. PRY: I don't believe

09:07:24 14 there was a second, was there?

09:07:25 15 MR. ARSHINKOFF: Second.

09:07:27 16 MR. JONES: Seconded by

09:07:28 17 Mr. Arshinkoff.

09:07:34 18 MR. HUTCHINSON: I don't know how

09:07:36 19 many there are, Mr. Chairman, there's

09:07:37 20 probably --

09:07:37 21 MR. JONES: I think we have to

09:07:38 22 get on the record who these people are so they

09:07:42 23 know.

09:07:42 24 MR. HUTCHINSON: I agree. But the

09:07:43 25 motion, I think, can be the way it is. I think

09:07:46 1 it's a proper motion.

09:07:50 2 MR. JONES: Mr. Rubino, is this

09:07:52 3 a proper motion? Mr. Rubino, did you hear the

09:07:53 4 motion of Mr. Hutchinson?

09:07:55 5 MR. RUBINO: No, I'm sorry, I

09:07:57 6 didn't.

09:07:57 7 MR. JONES: He's going to stop

09:07:58 8 this travesty.

09:08:00 9 MR. HUTCHINSON: I made a motion to

09:08:01 10 dismiss all of the challenges submitted by

09:08:05 11 Barbara Miller and by Lou Wray, and that motion

09:08:09 12 was seconded. All of them that are set for

09:08:13 13 today and Saturday.

09:08:17 14 MR. PRY: Mr. Morrison, I

09:08:18 15 assume Ms. Miller does not object as a

09:08:20 16 challenger to that motion?

09:08:22 17 MS. MILLER: I do not object.

09:08:24 18 MR. MORRISON: Let me ask her.

09:08:28 19 MS. MILLER: No, I do not

09:08:30 20 object.

09:08:30 21 MR. JONES: Mr. Wray, do you

09:08:31 22 object?

09:08:32 23 MR. WRAY: No.

09:08:33 24 MR. JONES: You do not object.

09:08:42 25 There's a motion on the table that

09:08:43 1 all challenges made by Barbara Miller and Lou
09:08:46 2 Wray be dismissed, and those people will have a
09:08:49 3 right to vote not provisionally, but a right to
09:08:52 4 vote and not be hassled at the precinct in which
09:08:55 5 they are voting, and we will send them
09:08:56 6 appropriate cards; is that correct?

09:08:58 7 MR. HUTCHINSON: No, that's not the
09:08:59 8 motion. The motion is to dismiss the
09:09:03 9 challenges.

09:09:03 10 MR. PRY: They would receive
09:09:04 11 the same information that the other people would
09:09:06 12 have received.

09:09:06 13 MR. HUTCHINSON: That the challenge
09:09:08 14 was dismissed.

09:09:10 15 MR. PRY: Correct.

09:09:11 16 MR. HUTCHINSON: That doesn't mean
09:09:12 17 that they can't be challenged later.

09:09:14 18 MR. PRY: Yes, it does. If
09:09:15 19 we dismiss the challenge today, it's done. They
09:09:18 20 can't be challenged again.

09:09:19 21 MR. HUTCHINSON: My motion is to
09:09:21 22 dismiss the challenge, whatever that entails.
09:09:23 23 I'm moving to dismiss the challenges for lack of
09:09:25 24 evidence, and whatever that entails, it entails.
09:09:32 25 Let the court decide later. That's the motion.

09:09:35 1 MR. ARSHINKOFF: I think that the
09:09:37 2 Ohio Republican Party prepared this list. If
09:09:40 3 there was somebody from the Ohio Republican
09:09:42 4 Party here to present their information, they
09:09:45 5 should have been here. They certainly aren't
09:09:47 6 here, and therefore, you know, this is a
09:09:55 7 terrible inconvenience to these people, and to
09:09:58 8 the system.

09:10:00 9 UNIDENTIFIED: It's a mockery of
09:10:01 10 the system.

09:10:02 11 MR. ARSHINKOFF: And so therefore I
09:10:03 12 just think that in this situation I'd like to
09:10:07 13 amend it to dismiss all of the challenges that
09:10:13 14 have been sent here on --

09:10:15 15 MR. HUTCHINSON: I accept the
09:10:16 16 amendment. My motion is amended to dismiss all
09:10:20 17 the challenges.

09:10:23 18 MS. KOMAROMY: Are you going to
09:10:24 19 notify --

09:10:25 20 MR. HUTCHINSON: Wait.

09:10:26 21 MR. JONES: You're out of
09:10:27 22 order. Just wait.

09:10:28 23 MR. HUTCHINSON: We'll deal with
09:10:29 24 your questions later, ma'am.

09:10:33 25 MS. McCRAVEY: I'm sorry, are we

09:10:35 1 inconveniencing you?

09:10:36 2 MR. HUTCHINSON: Ma'am, please.

09:10:36 3 MS. McCRANEY: I'm sorry, are we

09:10:36 4 inconveniencing you?

09:10:37 5 MR. HUTCHINSON: That's not the

09:10:38 6 question.

09:10:39 7 MS. McCRANEY: I'm it is the

09:10:40 8 question. You need to check your attitude.

09:10:42 9 MR. HUTCHINSON: I understand. We

09:10:43 10 have some partisans here today. But my motion

09:10:46 11 as amended is to dismiss all the challenges.

09:10:49 12 MR. JONES: You said the

09:10:50 13 challenges of Barbara Miller and Lou Wray.

09:10:52 14 MR. HUTCHINSON: All the challenges.

09:10:55 15 MR. ARSHINKOFF: And Howard Calhoun

09:10:57 16 and Madge Doelar?

09:10:58 17 MR. HUTCHINSON: All of them.

09:11:02 18 MR. PRY: Mr. Calhoun, do you

09:11:04 19 have any objection to your challenges being

09:11:06 20 dismissed?

09:11:06 21 MR. CALHOUN: No, I do not.

09:11:09 22 MR. DICKSON: Why did you do it?

09:11:11 23 MR. CALHOUN: None of your

09:11:12 24 business.

09:11:13 25 MR. PRY: Madge Doelar, do

09:11:15 1 you have any objection to your challenges being
09:11:16 2 dismissed?
09:11:17 3 MR. DICKSON: Who the hell are
09:11:18 4 you?
09:11:19 5 MR. JONES: Hey, hold on.
09:11:19 6 MS. DOELAR: Not really.
09:11:20 7 MR. JONES: Hold on, sir. It's
09:11:22 8 okay. There's been -- Mister, I don't know what
09:11:29 9 you're doing, but sit down just for right now,
09:11:32 10 please.
09:11:33 11 MR. KLINGSHIRN: It's a res judicata
09:11:34 12 issue, if I could --
09:11:36 13 MR. JONES: Thank you. You're
09:11:37 14 out of order now. I'll call you if you want to
09:11:39 15 speak.
09:11:40 16 Mr. Rubino.
09:11:42 17 MR. RUBINO: Based on the
09:11:43 18 colloquy between the fellows on Mr. Hutchinson's
09:11:46 19 motion and then Mr. Arshinkoff's amended motion,
09:11:50 20 it's not clear to me, and I think it should be
09:11:53 21 clear whether these people will be -- because
09:11:57 22 they're already here, you need to decide this
09:12:01 23 now whether or not they're going to be capable
09:12:04 24 of being challenged at the poles again, or
09:12:06 25 whether they have to file a provisional vote. I

09:12:08 1 wasn't clear based on how Joe framed his motion
09:12:11 2 and you guys had this discourse back and forth.

09:12:14 3 MR. ARSHINKOFF: I would think that
09:12:15 4 if anyone presents information here today that
09:12:23 5 proves their residency, they should be able to
09:12:26 6 vote without being challenged.

09:12:28 7 MR. RUBINO: What you're saying
09:12:29 8 then is the hearing has to continue to go
09:12:31 9 forward --

09:12:32 10 MR. HUTCHINSON: No, no.

09:12:34 11 MR. ARSHINKOFF: We're not.

09:12:34 12 MR. HUTCHINSON: I'm moving to
09:12:38 13 dismiss -- look. How is this so difficult,
09:12:38 14 Sandy? I am moving to dismiss all the
09:12:40 15 challenges. It's been seconded by
09:12:41 16 Mr. Arshinkoff. All of the challengers have
09:12:45 17 stated that they do not object to the motion.

09:12:49 18 MR. PRY: The basis --

09:12:51 19 MR. HUTCHINSON: I think the motion
09:12:53 20 should be voted on now.

09:12:54 21 MR. JONES: We still have
09:12:55 22 questions on the motion.

09:12:55 23 MR. PRY: As I understand the
09:12:56 24 basis of the motion is because there is no
09:12:58 25 evidence to support the challenges, and I

09:13:00 1 believe that was part of the motion.

09:13:01 2 MR. ARSHINKOFF: That is right.

09:13:03 3 MR. PRY: So it would be a

09:13:04 4 substantive decision, and I believe at that

09:13:07 5 point every one of the people who are on this

09:13:08 6 list would get the cards that they could not be

09:13:10 7 challenged on election day.

09:13:12 8 MR. HUTCHINSON: I'm not disagreeing

09:13:13 9 with that, but I'm not agreeing with it because

09:13:15 10 I don't know; but that's not the point. The

09:13:17 11 point is that we filed the motion to dismiss for

09:13:21 12 lack of evidence.

09:13:21 13 MR. PRY: Then we would have

09:13:23 14 to do that on an individual basis to resolve

09:13:25 15 these people's individual issues.

09:13:27 16 MR. HUTCHINSON: I think that -- I

09:13:29 17 don't -- in my view, I don't think that that's

09:13:32 18 necessarily true. I've made the motion, it is

09:13:36 19 what it is.

09:13:40 20 MR. ARSHINKOFF: Question on the

09:13:41 21 motion?

09:13:41 22 MR. JONES: Sir, would you like

09:13:43 23 to provide -- no, I'm talking to him. You're an

09:13:47 24 attorney, sir?

09:13:48 25 MR. KLINGSHIRN: Yes, I am. I'm

09:13:49 1 here on the behalf of Voter Protection
09:13:52 2 Coalition, and some of the challenged voters
09:13:54 3 have asked me to assist them.

09:13:56 4 On this motion we agree that all of
09:13:57 5 these challenges should be dismissed, the
09:14:00 6 question is whether it's, as lawyers would say,
09:14:03 7 with prejudice or not. We urge that they all be
09:14:06 8 dismissed with prejudice, and that each of the
09:14:08 9 voters who have been challenged here today be
09:14:11 10 permitted to provide evidence that they are
09:14:13 11 residents of the precinct in which they are
09:14:16 12 voting so that they will not face a new
09:14:20 13 challenge come November 2nd.

09:14:21 14 MR. ARSHINKOFF: That's fine.

09:14:22 15 MR. HUTCHINSON: I think that's
09:14:23 16 fine. I have no problem with that.

09:14:24 17 MR. PRY: No. I mean, the
09:14:26 18 way it is, it's bigger than that, sir. And it's
09:14:28 19 the issue that everyone who got a letter is
09:14:31 20 entitled to come here and have a hearing today.
09:14:33 21 And everyone when they leave here today is
09:14:34 22 entitled to know that they have a right to go
09:14:37 23 and vote following that. And the other instance
09:14:41 24 is if they couldn't take off work today, if they
09:14:43 25 couldn't get a babysitter today, if there were

09:14:45 1 other reasons, they don't have to come here and
09:14:48 2 necessarily come up with that type of proof.

09:14:50 3 We have challengers here, two now,
09:14:53 4 who have indicated that they don't have any
09:14:55 5 independent direct knowledge of the challenges
09:14:58 6 that were filed. And we're telling people now
09:14:59 7 that based on documents that we received where
09:15:03 8 people have no personal knowledge, no
09:15:06 9 independent knowledge, that we're going to make
09:15:08 10 them vote provisionally or that we're going to
09:15:10 11 make them change the way that they vote compared
09:15:13 12 to everybody else, and I am prepared to sit here
09:15:15 13 and go through all 900-and-some of these
09:15:18 14 individually so that we address that. And if
09:15:20 15 there's no evidence on each one of those, if
09:15:22 16 that's what it takes to protect those people's
09:15:25 17 rights to vote on election day without being
09:15:28 18 voted provisional, I'm prepared to sit here and
09:15:31 19 do it.

09:15:31 20 MR. HUTCHINSON: That's good for
09:15:32 21 you, but it doesn't take that. The motion can
09:15:34 22 be voted on and whatever legal effect it has, it
09:15:37 23 has.

09:15:38 24 MR. JONES: I want to make sure
09:15:39 25 it has the proper legal effect, Mr. Hutchinson.

09:15:42 1 MR. HUTCHINSON: How are you going
09:15:43 2 to make sure of that?
09:15:45 3 MR. JONES: The decision of us
09:15:46 4 is final, according to the law.
09:15:47 5 MR. HUTCHINSON: Then it is. Then
09:15:49 6 it is. If it is, certainly --
09:15:51 7 MR. JONES: I just want to make
09:15:52 8 sure that what we do here today does not
09:15:55 9 inconvenience these voters at the polling places.
09:15:58 10 They've been inconvenienced enough. And
09:16:01 11 Mr. Arshinkoff says the Ohio Republican Party,
09:16:03 12 and Mr. Wray says it was the Summit County
09:16:05 13 Republican Party that he spoke to, so you can't
09:16:07 14 wash your hands and say it was the Ohio people,
09:16:10 15 and they're not here. You both are officers in
09:16:11 16 the Republican Party in Summit County, so --
09:16:13 17 MR. HUTCHINSON: What does that have
09:16:14 18 to do with the motion? The motion is to
09:16:17 19 dismiss. Are you two both saying that you do
09:16:19 20 not want these dismissed when you both believe
09:16:22 21 that it will be with prejudice? Is that what
09:16:24 22 you both are saying?
09:16:25 23 MR. JONES: I'm going to make a
09:16:27 24 motion -- I'm going to amend --
09:16:28 25 MR. HUTCHINSON: Mr. Chairman, it

09:16:31 1 seems to me you are. We have a motion --

09:16:32 2 MR. PRY: The game is that

09:16:34 3 we're here.

09:16:35 4 MR. JONES: That's the big

09:16:36 5 game. That's the big game.

09:16:36 6 MR. HUTCHINSON: Maybe so. Maybe

09:16:38 7 that's the game. But the point is that I've

09:16:40 8 made a motion to dismiss, it's been seconded.

09:16:44 9 MR. JONES: I'm going to move

09:16:45 10 to amend the motion. I'm going to move to amend

09:16:48 11 the motion that the decisions that we make today

09:16:53 12 on all of the challenges are dismissed with

09:16:58 13 prejudice, and these people will not be

09:16:58 14 challenged. We will give them proper

09:17:00 15 documentation that they will not be challenged

09:17:02 16 at the poles.

09:17:03 17 MR. PRY: I'll second the

09:17:05 18 amendment.

09:17:06 19 MR. JONES: Moved and seconded.

09:17:08 20 MR. HUTCHINSON: Discussion on that

09:17:09 21 motion?

09:17:10 22 MR. MORRISON: Mr. Chairman, may I

09:17:11 23 be heard?

09:17:11 24 MR. HUTCHINSON: No.

09:17:12 25 MR. MORRISON: When you have a

09:17:13 1 moment?

09:17:13 2 MR. HUTCHINSON: Hang on just a

09:17:14 3 minute.

09:17:16 4 I don't have a problem with that.

09:17:19 5 MR. JONES: Then vote for it.

09:17:21 6 MR. HUTCHINSON: Then I think we

09:17:23 7 will -- I think I will. But I guess the point

09:17:25 8 is, I'm not sure that we as a Board can

09:17:29 9 ultimately decide what -- how this will

09:17:32 10 ultimately turn out on Tuesday. That's all I'm

09:17:35 11 saying. I don't know.

09:17:36 12 MR. PRY: We are

09:17:37 13 substantively rejecting the challenges at this

09:17:40 14 point based on a lack of evidence.

09:17:42 15 MR. HUTCHINSON: I agree with that.

09:17:44 16 MR. JONES: You agree with the

09:17:45 17 amendment?

09:17:45 18 MR. HUTCHINSON: I do. I agree to

09:17:47 19 amend my motion with your amendment.

09:17:49 20 MR. JONES: All in favor of the

09:17:51 21 amendment to the motion?

09:17:51 22 MR. HUTCHINSON: Aye.

09:17:51 23 MR. ARSHINKOFF: Aye.

09:17:51 24 MR. JONES: Aye.

09:17:52 25 MR. PRY: Aye.

09:17:52 1 MR. JONES: Oppose?
09:17:52 2 Motion on the table as amended, all
09:17:54 3 in favor?
09:17:55 4 MR. HUTCHINSON: Aye.
09:17:55 5 MR. ARSHINKOFF: Aye.
09:17:55 6 MR. JONES: Aye.
09:17:55 7 MR. PRY: Aye.
09:17:56 8 MR. JONES: Opposed?
09:17:56 9 All of your challenges have been
09:17:59 10 dismissed with prejudice, so you can vote. And
09:18:03 11 anybody that would like to make a statement, I'm
09:18:06 12 allowing you to make a statement at this time.
09:18:07 13 Since you took the time off work to come, I
09:18:10 14 think you have a right to speak and just state
09:18:12 15 your name. And we're not going to swear you in
09:18:14 16 because there's nothing before us. But I think
09:18:17 17 you should have a right to talk.
09:18:18 18 MR. MCCRANEY: My name is Rashawn
09:18:21 19 McCraney, and all I have to say is anybody
09:18:23 20 that's here challenging votes, or if you're put
09:18:26 21 up to challenge votes, on behalf of anybody that
09:18:30 22 has evil intentions on your heart, I pray that
09:18:33 23 God have mercy on you because he is not pleased.
09:18:36 24 The Bible says touch not God's anointed, which I
09:18:38 25 am, and you challenged me. I pray that God has

09:18:42 1 mercy on you, because he is not pleased. That's
09:18:44 2 all I have to say.

09:18:45 3 MR. JONES: Thank you.

09:18:47 4 MS. McCRAVEY: As his witness, and
09:18:49 5 also as his wife, I really think this is
09:18:51 6 inappropriate. And I also wanted to address in
09:18:54 7 particular Mr. Joseph F. Hutchinson, Jr., who
09:18:57 8 appears to have a very negative disposition
09:19:00 9 about the fact that you're here.

09:19:01 10 Unfortunately, we also had to come
09:19:03 11 here as well, and we were also inconvenienced.
09:19:05 12 And I'm sorry that you, for whatever reason, can
09:19:08 13 lean back in your chair with your leg crossed as
09:19:11 14 if we're bothering you. But we were challenged,
09:19:14 15 and I really think it's appalling that four
09:19:17 16 senior citizens can come here and sign their
09:19:20 17 documents, sign their name to 200 documents
09:19:23 18 apiece of people you have never met.

09:19:26 19 Mr. Lou Wray, you challenged my
09:19:29 20 husband, and we live in the same neighborhood.
09:19:31 21 Okay? But you've never met us a day in our
09:19:33 22 lives, hard-working individuals. My husband is
09:19:35 23 a full-time student at Kent State University,
09:19:37 24 where I also possess a bachelor's degree and a
09:19:41 25 master's degree. We work hard just like you do,

09:19:44 1 trying to make our livings, trying to prove
09:19:47 2 ourselves in this world to get to the point
09:19:50 3 where we're 80 years old, like you.
09:19:51 4 But you signed your name to 200
09:19:54 5 documents of people you have never, ever met a
09:19:56 6 day in your life, challenging our right to vote.
09:19:58 7 And you don't even know whether we live at 72
09:20:01 8 White Hall Drive in Tallmadge, Ohio. You have
09:20:04 9 no idea. Somebody just called you on the phone
09:20:06 10 and asked you to do a favor and you said okay.
09:20:09 11 And now you look foolish standing up here
09:20:12 12 saying, "I don't know. They just called me on
09:20:13 13 the phone. I don't have anything." You look
09:20:15 14 silly. And we have to be inconvenienced and we
09:20:17 15 have to come to work. And.
09:20:18 16 You as well, pleading the Fifth, how
09:20:20 17 can you plead the Fifth when you signed your
09:20:22 18 name to 200 documents, over, of people you've
09:20:25 19 never met, and then you come here as if it's a
09:20:28 20 problem for you, and you plead the Fifth like
09:20:30 21 you don't have anything to say. You do have
09:20:32 22 something to say. Come up and prove to these
09:20:34 23 people that you have a right to challenge them.
09:20:36 24 You do not. Nor do you, nor do you.
09:20:36 25 (Indicating.)

09:20:39 1 And you need to apologize and
09:20:41 2 something needs to happen to you. This was a
09:20:44 3 waste of our time. I thank you for dismissing
09:20:47 4 the challenge, and I would appreciate something
09:20:51 5 in writing saying my husband can vote. It's
09:20:54 6 ridiculous. You didn't challenge me but you
09:20:57 7 challenged him, and we live at the same address.
09:21:00 8 How crazy is that? You didn't challenge this
09:21:02 9 gentleman, but you challenged his wife, and they
09:21:04 10 live at the same address.

09:21:06 11 You all are wasting your time, and
09:21:08 12 time is too short, entirely too short. And we
09:21:12 13 don't know how many more hours we're promised.
09:21:16 14 You've been lucky and fortunate enough to make
09:21:18 15 it to 80 years of life, and it is so unfortunate
09:21:21 16 that for the last hour and a half you've wasted
09:21:23 17 your time and my time. So who's promise to
09:21:27 18 who -- you're not promised to see 81, I'm not
09:21:30 19 promised to see 29, but you've wasted an hour
09:21:32 20 and a half of my time that I'm not promised ever
09:21:35 21 to get back. And I thank you for that.

09:21:37 22 MR. JONES: Thank you. One
09:21:39 23 other thing. I'm going to ask that the Summit
09:21:42 24 County Prosecutor investigate the challenges and
09:21:46 25 make a determination if, in fact, knowledge is

09:21:50 1 necessary, because it does say "under penalty of
09:21:53 2 election falsification," which is a felony of
09:21:56 3 the fifth degree. People have to sign these,
09:21:58 4 and it's my belief that they have to sign them
09:22:00 5 with some knowledge. I want the prosecutor to
09:22:02 6 look into this, and if, in fact, they come to
09:22:05 7 that conclusion, I would like the people
09:22:07 8 prosecuted.

09:22:07 9 UNIDENTIFIED: I think people
09:22:08 10 ought to be prosecuted.

09:22:11 11 MR. HUTCHINSON: It's not up to you.
09:22:11 12 Let's have some order in here.

09:22:12 13 Mr. Jones, is that a motion?

09:22:15 14 MR. JONES: No, it's not a
09:22:16 15 motion.

09:22:17 16 MR. HUTCHINSON: Mr. Jones, is that
09:22:18 17 a motion?

09:22:19 18 MR. JONES: No, it's not a
09:22:20 19 motion. It's a statement.

09:22:22 20 MS. TRIPLET: My name is Patricia
09:22:23 21 Triplet. I have lived in my precinct for 35
09:22:27 22 years. A block away I've lived for 20 years,
09:22:31 23 I've lived 15 years. You don't know me, and you
09:22:36 24 brought me up here. We have boys and girls over
09:22:38 25 in another country fighting for someone else's

09:22:41 1 right to vote, and you challenge my right to
09:22:45 2 vote in this country. How sad this is. How sad
09:22:49 3 this is that you're allowed to do that to us.
09:22:53 4 It's just unbelievable and it scares me.
09:22:56 5 MR. JONES: Thank you. It
09:22:57 6 scares me, too.
09:23:00 7 Anything else? State your name,
09:23:04 8 please.
09:23:04 9 MR. DICKSON: My name is Gilbert
09:23:06 10 Dickson, and I was telling the gentleman that
09:23:08 11 just left. He didn't have time enough to see
09:23:10 12 how this turns out, but I think something ought
09:23:12 13 to be down about these four characters here.
09:23:15 14 Yeah. I think you guys need to prosecute them.
09:23:18 15 MR. JONES: Thank you.
09:23:19 16 MR. PRY: Thank you.
09:23:20 17 MR. DICKSON: That's a waste of
09:23:21 18 time.
09:23:21 19 MR. JOHNSON: I'm sorry, I just
09:23:24 20 wanted to say something. My name is Ervin
09:23:25 21 Johnson.
09:23:26 22 MR. JONES: Yeah. We started
09:23:27 23 to do Ervin. Sorry about that.
09:23:29 24 MR. JOHNSON: It's okay. I don't
09:23:30 25 know. Like, as far as the challengers are

09:23:33 1 concerned, like, maybe you should instead check
09:23:37 2 out who called them instead of them themselves,
09:23:41 3 because if they're asked, you know, sign these
09:23:44 4 papers -- you know, these people are committing
09:23:46 5 voter fraud and they're trying to do their duty.
09:23:49 6 And I understand they didn't know a thing, but
09:23:51 7 obviously there's no proof, obviously, as they
09:23:54 8 realized.

09:23:55 9 But I think that there should be
09:23:59 10 something done as far as getting down to -- you
09:24:00 11 said a gentleman named Mike. What was his last
09:24:03 12 name, you know? Let somebody know who called
09:24:05 13 you and said, "Sign these papers." Because my
09:24:08 14 driver's license says I live at the address that
09:24:10 15 I live at, you know. I'm sure all of these
09:24:13 16 people's driver's licenses say they live at the
09:24:16 17 address that it was listed on the voter
09:24:18 18 registration. You know, just tell somebody who
09:24:21 19 the person is, not just Mike. Mike who? You
09:24:25 20 know, from what political party and what
09:24:28 21 organization? Who told you to do this?

09:24:31 22 MR. JONES: It was Mike from
09:24:32 23 the Summit County Republican Party is what he
09:24:35 24 said.

09:24:35 25 MR. JOHNSON: Oh, I'm sorry.

09:24:37 1 MS. DOELAR: I wasn't told, I
09:24:38 2 was asked.
09:24:39 3 MR. JOHNSON: Who asked you to?
09:24:41 4 That's what I'm wondering. Who said, "You know
09:24:43 5 what? This mail came back to us." You didn't
09:24:47 6 see anything. You just said, "Okay, here is my
09:24:49 7 signature. I verily believe that." That's what
09:24:52 8 it says, "I verily believe that." It means I
09:24:54 9 have personal knowledge. That's what "verily
09:24:56 10 believe" means. It means I have personal
09:24:59 11 knowledge that this person does not live there
09:25:01 12 and I approve it.
09:25:02 13 You said, "Oh, it just means I
09:25:04 14 believe that." Well, I believe that they don't
09:25:06 15 live there. You know, that's ridiculous.
09:25:08 16 I'm sorry. And I went to bed at four
09:25:11 17 in the morning because I got off work at three,
09:25:13 18 and I still made it here because I want to vote.
09:25:16 19 Right now I'm going home and I'm going to bed.
09:25:19 20 MR. ARSHINKOFF: Good for you.
09:25:20 21 MR. JONES: Thank you. I
09:25:21 22 apologize to you. I want to apologize to
09:25:23 23 everybody here that had to come out today for
09:25:25 24 this travesty of people's rights to vote.
09:25:29 25 We have our sons and daughters in

09:25:31 1 Iraq and Afghanistan fighting for democracy and
09:25:35 2 I think sometimes we lose track of democracy
09:25:38 3 here in the United States.

09:25:39 4 Anything else to come before this
09:25:40 5 hearing? Anybody else? Yes, ma'am?

09:25:43 6 MS. KOMAROMY: My name is Moria
09:25:46 7 Autumn Komaromy. I was unclear on the motion.
09:25:47 8 Now, are all 900-plus people that received
09:25:50 9 challenges going to be notified, and how will
09:25:52 10 they be notified that they still have the right
09:25:54 11 to vote?

09:25:57 12 MR. ARSHINKOFF: Ma'am, were you
09:25:57 13 challenged?

09:25:59 14 MS. KOMAROMY: No, I was not. I'm
09:25:59 15 a witness to Barbara Jean DeWilde who was
09:26:02 16 challenged.

09:26:02 17 MR. JONES: That's a good
09:26:03 18 question. I think we've talked about how we're
09:26:04 19 going to do that. We're going to clip a note to
09:26:07 20 the voter registration card in the precinct in
09:26:10 21 which they vote. We're also going to send out i
09:26:12 22 regular mail, and we'll have a copy here if they
09:26:14 23 want to come and pick it up. We'll do it three
09:26:16 24 ways.

09:26:17 25 MS. KOMAROMY: Because, I mean,

09:26:18 1 35,000 people in Ohio have gotten a letter of
09:26:22 2 intimidation by the Republican Party challengers
09:26:26 3 saying they cannot vote. How are we going to
09:26:29 4 correct that so they know they can vote? Going
09:26:31 5 to the poles and having a card or a letter when
09:26:33 6 there's already problems with their mail is not
09:26:35 7 helping it.

09:26:36 8 MR. JONES: What do you
09:26:38 9 suggest?

09:26:38 10 MS. KOMAROMY: Are you releasing a
09:26:39 11 statement --

09:26:40 12 MR. JONES: Well, the press
09:26:40 13 will be covering this. I mean, we have press
09:26:42 14 here from radio stations, from "The Cleveland
09:26:46 15 Plain Dealer," the "Akron Beacon Journal,"
09:26:48 16 they're all here.

09:26:49 17 MR. ARSHINKOFF: WAKR.

09:26:49 18 MR. JONES: WAKR Radio

09:26:51 19 MS. KOMAROMY: And I would also
09:26:53 20 like to know what's going to be done about this
09:26:54 21 for future elections, like in 2008, so this is
09:26:58 22 not pulled again?

09:27:00 23 MR. JONES: I think we have to
09:27:02 24 change the statute in which the -- that was
09:27:03 25 used. This is a 1953 statute. We believe it

09:27:05 1 was before 1953. And it was actually General
09:27:08 2 Code Section, which some people decided to use.
09:27:12 3 And I think it's improper. And because it's
09:27:14 4 really never been used in this way before, it
09:27:17 5 kind of fell in the books and nobody really paid
09:27:20 6 attention.

09:27:20 7 MS. KOMAROMY: This is no
09:27:21 8 different than discrimination, like Jim Crow
09:27:24 9 Laws a long time ago.

09:27:25 10 MR. JONES: I think you're
09:27:26 11 correct. I think it's exactly where it came
09:27:29 12 from. That's my personal opinion.

09:27:29 13 MS. KOMAROMY: I mean, I just
09:27:29 14 would like to ask the Board members, are you all
09:27:31 15 going to do your best to make sure this does not
09:27:33 16 happen again? Because you've all agreed this is
09:27:36 17 a waste of time and inconvenience to voters.
09:27:38 18 Are you guys all going to do your best to
09:27:41 19 make --

09:27:42 20 MR. JONES: You really can't
09:27:44 21 ask us. I mean, you can ask us individually
09:27:45 22 after, but I'll tell you, I will. I'll make
09:27:48 23 sure it doesn't --

09:27:49 24 MR. HUTCHINSON: When people file
09:27:50 25 challenges, we have to deal with them. We have

09:27:53 1 to deal with them.

09:27:54 2 MS. KOMAROMY: Why not make it so
09:27:56 3 that votes cannot be challenged by the free
09:27:58 4 citizens of America?

09:27:59 5 MR. PRY: That the challenges
09:28:02 6 that we've dealt with in the past were people
09:28:04 7 that came in here and had direct knowledge.

09:28:07 8 MR. HUTCHINSON: They said that
09:28:08 9 their neighbor had moved and that sort of thing,
09:28:10 10 that they didn't live there, that the house had
09:28:13 11 been torn down.

09:28:14 12 MR. JONES: I think we had five
09:28:16 13 of those in five years, and now we have 900
09:28:16 14 and --

09:28:21 15 MS. KOMAROMY: Five compared to
09:28:23 16 the millions that --

09:28:23 17 MR. HUTCHINSON: This has never
09:28:24 18 happened before. This has never happened where
09:28:27 19 we've had a mass challenges. It's never
09:28:29 20 happened.

09:28:29 21 MR. JONES: Anybody else?
09:28:30 22 Since you've come here, I want to give you an
09:28:32 23 opportunity in a public setting to say your
09:28:34 24 piece.

09:28:37 25 UNIDENTIFIED: You can't come up

09:28:38 1 with some could kind of stamp that we can take
09:28:40 2 and put up on these things?
09:28:41 3 MR. JONES: We're going to give
09:28:43 4 you in a letter, sir.
09:28:44 5 UNIDENTIFIED: That will come --
09:28:46 6 MR. ARSHINKOFF: Do you have a voter
09:28:47 7 registration card with you?
09:28:48 8 UNIDENTIFIED: Yes.
09:28:48 9 MR. ARSHINKOFF: Well, that's all
09:28:49 10 you need.
09:28:49 11 MR. JONES: That's not all he
09:28:50 12 needs. I mean, he's concerned that he's been
09:28:53 13 challenged before, and since the Republican
09:28:56 14 Party has put a bunch of challengers in these
09:28:59 15 poling places, I think he's concerned.
09:29:01 16 MR. HUTCHINSON: There will be the
09:29:03 17 result of this hearing clipped to his card at
09:29:06 18 the poling place. That's what we decided.
09:29:10 19 MR. PRY: Right.
09:29:12 20 MR. JONES: Anybody else?
09:29:17 21 One other thing that's really before
09:29:19 22 the Board is we talked with cell phones. I
09:29:21 23 don't know if you want to talk about cell phones
09:29:23 24 on Election Day. It's a very large expenditure.
09:29:28 25 Marge, I'm sorry.

09:29:31 1 MS. KOOSSED: I understand that
09:29:32 2 several more, hundreds more people will be here
09:29:34 3 through the day. Are they going to be given an
09:29:37 4 opportunity to provide their voice on this
09:29:39 5 matter? And how, if at all, will you notify
09:29:42 6 these individuals so that they aren't further
09:29:45 7 inconvenienced? I appreciate -- I hope that the
09:29:47 8 news media will promptly report on this and
09:29:50 9 inform individuals that they need not appear.
09:29:52 10 MR. HUTCHINSON: Especially
09:29:53 11 Saturday.
09:29:55 12 MS. KOOSSED: I think it would be
09:29:56 13 appropriate to provide some form of assistance
09:29:59 14 and lessen the inconvenience factor that we've
09:30:02 15 all recognized --
09:30:03 16 MR. JONES: There's no reason
09:30:04 17 why we can't get -- Sandy, is there a reason why
09:30:07 18 we can't get a quick summary of what was done
09:30:09 19 here and give it to the people by name?
09:30:11 20 MR. RUBINO: I indicated to
09:30:13 21 Bryan that I would help him draft something
09:30:15 22 similar to --
09:30:17 23 MR. JONES: Can we do it
09:30:19 24 quickly?
09:30:21 25 MR. HUTCHINSON: We can look at it

09:30:22 1 and get it done. We'll try to have it soon.

09:30:25 2 MR. PRY: Mr. Chairman, you

09:30:29 3 have hearings at 10 and 11.

09:30:29 4 MR. SCHMIDT: We will get it in

09:30:31 5 the regular mail by 8:30 tonight.

09:30:33 6 MR. JONES: Yeah, I know, John,

09:30:33 7 but they want it in their hands, and I can't

09:30:36 8 blame them. I don't blame them.

09:30:38 9 MR. PRY: How are you going

09:30:39 10 to notify the people that are coming on

09:30:40 11 Saturday?

09:30:41 12 MR. SCHMIDT: We'll send them the

09:30:43 13 exact same letter that we will send to the

09:30:45 14 other --

09:30:46 15 MR. ARSHINKOFF: We can send them

09:30:47 16 something overnight, can't we?

09:30:50 17 MR. SCHMIDT: If it gets in the

09:30:51 18 mail by 8:30 tonight, they should get it

09:30:53 19 tomorrow.

09:30:53 20 MR. JONES: Why can't we have

09:30:55 21 people do personal delivery?

09:30:57 22 MR. ARSHINKOFF: Eight hundred?

09:30:59 23 MR. JONES: Hey, I didn't do

09:31:00 24 it.

09:31:09 25 Madau, do you know any other way to

09:31:12 1 do this than to give a journal entry. This is
09:31:15 2 Madau from the Secretary of State's office.
09:31:19 3 MS. SUNGH: Our office would
09:31:28 4 leave it to the Board to make a decision with
09:31:29 5 the prosecutor.
09:31:31 6 MR. JONES: Okay. So it's
09:31:31 7 going to be up to how the prosecutor --
09:31:33 8 MS. SUNGH: No. Decide what
09:31:35 9 you want to do.
09:31:36 10 MR. SCHMIDT: Mr. Chairman?
09:31:38 11 MR. JONES: Yes, John?
09:31:39 12 MR. SCHMIDT: Anybody that would
09:31:40 13 like one right now, we have an authorization to
09:31:42 14 vote card we can fill out for them right away.
09:31:45 15 They can hang on to it. It's a voter
09:31:47 16 authorization card.
09:31:48 17 MR. JONES: That would be a
09:31:49 18 good thing to get to the people that are here.
09:31:51 19 In case they have a problem, keep it in your
09:31:53 20 back pocket.
09:31:55 21 Do you want to talk about cell
09:31:56 22 phones, or not?
09:31:57 23 MR. ARSHINKOFF: Well, obviously,
09:31:58 24 there are going to be plenty of questions on
09:32:00 25 Election Day. My feeling is we probably ought

09:32:03 1 to be able to have something for these people to
09:32:05 2 call in.

09:32:11 3 MR. PRY: Let Brian
09:32:13 4 investigate it?

09:32:13 5 MR. SCHMIDT: Mr. Chairman, every
09:32:15 6 single one of our 206 polling places either has a
09:32:19 7 readily available telephone or we provide a cell
09:32:22 8 phone to them.

09:32:22 9 MR. ARSHINKOFF: That's not true.
09:32:24 10 In the schools they've got to go the principal's
09:32:26 11 office. Are they going to leave the polling
09:32:29 12 place on Election Day with all that stuff going
09:32:31 13 on and go to the principal's office and hope
09:32:34 14 they aren't conducting business, or to the
09:32:36 15 pastor's office or whatever? I don't have a
09:32:38 16 problem with that.

09:32:39 17 MR. JONES: I just think we
09:32:40 18 have to authorize it.

09:32:42 19 MR. ARSHINKOFF: I think if they're
09:32:43 20 voting, there's questions, there's going to be
09:32:45 21 temp --

09:32:47 22 MR. JONES: Is Brian --

09:32:49 23 MR. SCHMIDT: If you want us to
09:32:50 24 look into it, we'll look into it.

09:32:52 25 MR. JONES: Brian was looking

09:32:54 1 into it.

09:34:04 2 MR. VEHAR: My name is Randall

09:34:07 3 Vehar, and I'm also with the Ohio Voter

09:34:09 4 Protection Project.

09:34:10 5 MR. JONES: Excuse me.

09:34:11 6 Mr. Morrison, quiet. Marge. Thank you.

09:34:14 7 MR. VEHAR: I've been told that

09:34:16 8 both parties have, at least for a significant

09:34:19 9 number of these 976 people, their phone numbers.

09:34:23 10 Some people don't read the newspapers, and even

09:34:25 11 if a letter was sent out to them they may not

09:34:27 12 get it in time of whether they need to come in

09:34:30 13 on Saturday. Is there any possibility that the

09:34:33 14 people that were responsible in the first place

09:34:35 15 for bringing these people here get on the phone,

09:34:40 16 or the Board of Elections get on the phone and

09:34:43 17 notify them that they don't have to be here?

09:34:44 18 MR. JONES: I think it would

09:34:46 19 have to come from the Board, I don't know, I

09:34:47 20 trust the people to call them.

09:34:49 21 MR. VEHAR: That was a bad

09:34:50 22 suggestion on my part. I apologize.

09:34:52 23 MR. JONES: Bad suggestion.

09:34:56 24 Kelly, do we have phone numbers on --

09:34:58 25 do we know if we have phone numbers on these

09:35:00 1 challenged votes?

09:35:01 2 MS. KELLY: No.

09:35:03 3 MR. JONES: We do not?

09:35:04 4 MR. VEHR: No.

09:35:06 5 UNIDENTIFIED: They came from the

09:35:07 6 Republican headquarters. The phone numbers are

09:35:12 7 listed with the addresses. That's --

09:35:17 8 UNIDENTIFIED: When you register

09:35:19 9 they have your name, age --

09:35:21 10 MS. KELLY: We don't put the

09:35:23 11 phone number on our system, though. We don't

09:35:25 12 use the phone number.

09:35:27 13 MS. KOMAROMY: I can get on-line

09:35:29 14 and look up anybody's phone number.

09:35:30 15 MR. JONES: If you give us the

09:35:32 16 phone numbers --

09:35:32 17 MS. KOMAROMY: No. I'm saying if

09:35:33 18 I can do it, why can't anybody else?

09:35:35 19 MR. JONES: Okay. Thank you.

09:35:37 20 All right.

09:35:38 21 Bryan, we were talking about cell

09:35:40 22 phones. Did you have a chance to look at it?

09:35:43 23 MR. WILLIAMS: We called the

09:35:44 24 county cell phone. They are not able to provide

09:35:44 25 additional -- we have 31 issued now. They

09:35:47 1 cannot provide additional ones in this time
09:35:50 2 frame.

09:35:50 3 I did receive one call back late
09:35:52 4 yesterday afternoon from Alltel directly. He
09:35:54 5 has a proposal to make, but he can't get one for
09:35:57 6 every precinct, but he can get a lot. I don't
09:36:00 7 know how much they would cost, nor do I have yet
09:36:02 8 in writing how many numbers he can issue at
09:36:04 9 Election Day.

09:36:05 10 MR. JONES: How about, at a
09:36:06 11 minimum, we get one per voting place?

09:36:09 12 MR. WILLIAMS: That would be 206.
09:36:09 13 And I told him that if he can't get 475, our
09:36:14 14 next rationale would be to get 206 minus -- we
09:36:15 15 need 20 for our troubleshooters, so 206 minus
09:36:19 16 about 15. And he was going to try that as
09:36:21 17 secondhand total featureless. The cheapest they
09:36:23 18 can be, they would need to be on one week at a
09:36:26 19 time for about five elections a year. Cell
09:36:28 20 phones are becoming commonplace in other large
09:36:30 21 counties. They pretty much --

09:36:34 22 MR. ARSHINKOFF: We all agree that
09:36:34 23 we need them. The question is, what can we get,
09:36:39 24 let's get as many as we can, one per polling
09:36:39 25 place, plus your troubleshooters. So you need

09:36:42 1 206 plus 15.

09:36:43 2 MR. JONES: Plus we've

09:36:45 3 increased the troubleshooters, correct?

09:36:49 4 MR. WILLIAMS: We have 20 total

09:36:51 5 troubleshooting teams.

09:36:52 6 MR. JONES: So we have 40

09:36:54 7 people out in the field?

09:36:55 8 MR. WILLIAMS: Fourteen are

09:36:56 9 assigned to the Board of Elections, sixteen are

09:36:58 10 roving in the field.

09:37:00 11 MR. ARSHINKOFF: So you only need

09:37:01 12 one cell phone per team.

09:37:03 13 MR. WILLIAMS: Which is what we've

09:37:04 14 been doing for the last few elections.

09:37:07 15 MR. JONES: And then we have

09:37:07 16 hotlines set up, that those lines are public

09:37:10 17 lines that the troubleshooters --

09:37:13 18 MR. WILLIAMS: The troubleshooters

09:37:15 19 know the direct lines of all Board employees.

09:37:17 20 The booth workers are given eight direct phone

09:37:20 21 lines the public doesn't have, and then the

09:37:21 22 public would get 10 lines in addition to our 30

09:37:23 23 lines for the public to call in.

09:37:25 24 MR. JONES: I would like to

09:37:27 25 make a motion that we authorize the director and

09:37:30 1 deputy director to enter into a contract for
09:37:32 2 cell phones for at the minimum 206.

09:37:36 3 MR. ARSHINKOFF: If they can get
09:37:37 4 them for every precinct, fine. But if they can
09:37:40 5 only get them for the polling places, fine.

09:37:42 6 MR. JONES: Or if, in fact, the
09:37:43 7 presiding judge and booth workers have their own
09:37:46 8 cell phones, we would be willing to reimburse
09:37:49 9 them if we can't get them.

09:37:49 10 MR. ARSHINKOFF: That's an existing
09:37:51 11 policy.

09:37:51 12 MR. WILLIAMS: We've been
09:37:53 13 reimbursing 10 cents a minute for their personal
09:37:53 14 use.

09:37:53 15 MR. JONES: Not their personal
09:37:53 16 use.

09:37:53 17 MR. WILLIAMS: Not for their
09:37:56 18 personal use, but their personal cell phone for
09:37:57 19 Board business.

09:37:59 20 MR. HUTCHINSON: Second.

09:38:00 21 MR. JONES: Moved and seconded.
09:38:02 22 All in favor?

09:38:02 23 MR. HUTCHINSON: Aye.

09:38:02 24 MR. ARSHINKOFF: Aye.

09:38:02 25 MR. JONES: Aye.

09:38:02 1 MR. PRY: Aye.
09:38:03 2 MR. JONES: Opposed? The ayes
09:38:05 3 have it.
09:38:05 4 Anything else to come before this
09:38:07 5 Board?
09:38:14 6 Steve? The Plain Dealer -- we'd like
09:38:15 7 to know if the Plain Dealer would like to come
09:38:17 8 out with their endorsement at this time?
09:38:19 9 MR. ARSHINKOFF: Lisa, do you have
09:38:21 10 anything you want to add?
09:38:23 11 Larry, do you have anything you want
09:38:24 12 to add?
09:38:25 13 MR. LARRY: We've heard enough,
09:38:26 14 I think.
09:38:27 15 MR. JONES: Thank you all for
09:38:28 16 coming. We again apologize. Adjourned.
17 (Thereupon, the proceedings were
18 concluded at 9:38 o'clock a.m.)
19 - - -
20
21
22
23
24
25

C E R T I F I C A T E

STATE OF OHIO,)
) SS:
SUMMIT COUNTY,)

I, Anika W. Patrick, a Registered Professional Reporter and Notary Public within and for the State of Ohio, duly commissioned and qualified, do hereby certify that these proceedings were taken by me and reduced to Stenotypy, afterwards prepared and produced by means of Computer-Aided Transcription and that the foregoing is a true and correct transcription of the proceedings so taken as aforesaid.

I do further certify that these proceedings were taken at the time and place in the foregoing caption specified.

I do further certify that I am not a relative, employee of or attorney for any party or counsel, or otherwise financially interested in this action.

I do further certify that I am not, nor is the court reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28(D).

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal of office at Akron, Ohio on this 28th day of October, 2004.

Anika W. Patrick, RPR

My commission expires March 13, 2005.

- - -

Exhibit 12

The RNC has chosen to rely upon Dr. John R. Lott, Jr. ("Dr. Lott") as its expert in this case to challenge the work of the Intervenor's expert, Dr. Phil Klinkner ("Dr. Klinkner"). Dr. Lott's primary area of expertise is gun control. See Dr. Lott's Depo. Transcript at 138. His first exposure to voting rights was his work concluding that African Americans in Florida were *not* disenfranchised during the 2000 Presidential Election.¹ See "Nonvoted Ballots and Discrimination in Florida," by John R. Lott, Jr., 32 *J. Legal Stud.* 181, January 2003, Dr. Lott Depo. Exhibit 3. See also "What Really Happened in Florida's 2000 Presidential Election," by Allan J. Lichtman, 32 *J. Legal Stud.* 221, January 2003 (refuting Dr. Lott's analysis). See also Dr. Lott Depo. Exhibit 8 (transcript of CNN interview in which Dr. Lott argues that the disenfranchisement of African-American voters in Florida during the 2000 Presidential election is "a lot of myths").

Dr. Lott's "most important" concern with Dr. Klinkner's analysis is that Dr. Klinkner did not factor into his analysis the possibility that there might be "fake registrations" by "nonpersons." See Dr. Lott's Depo. Transcript at 34-35, 90. It is ironic

¹ Dr. Lott's work in this regard was initially performed in his role as consultant to the dissenters on the United States Commission on Civil Rights. See e.g. "The Florida Election Report: Dissenting Statement By Commissioner Abigail Thernstrom and Commissioner Russell G. Redenbaugh, July 19, 2001," found at <http://www.usccr.gov/pubs/vote2000/report/dissent.htm>, and "Appendix X – Supplemental Report on the Racial Impact of the Rejection of Ballots Cast in Florida's 2000 Presidential Election and in Response to the Statement of Dissenting Commissioners and Report by Dr. John Lott Submitted to the United States Senate Committee on Rules in July 2001, found at <http://www.usccr.gov/pubs/vote2000/report/appendix/app10.htm>.

indeed that the issue of “nonpersons” is of paramount concern to Dr. Lott, given that Dr. Lott acknowledges having himself used a “nonperson” to tout his own work and chastise his critics in “general discussions of the research and stuff like that.” Id. at 115-16. In fact, entire websites are dedicated to Dr. Lott’s use of the fictitious name “Mary Rosh.” See e.g. www.whoismaryrosh.com, Dr. Lott Depo. Exhibit 5. Dr. Lott also acknowledges allegations that he has used a second alias, “Washingtonian,” but claims not to have “discussed issues using it.” See “John Lott’s Fabricated Identities,” Dr. Lott Depo. Exhibit 4; Dr. Lott Depo. Transcript at 134, 137.²

While Dr. Lott is fixated on the possibility that the 35,000 names on the challenge list compiled by the Republican Party of Ohio might include “nonpersons,” Dr. Lott is not aware of either the Republican Party of Ohio, the RNC, Ohio election officials or anyone else having made a single determination that anyone whose name appears on the list is not in fact properly registered. See Dr. Lott Depo. Transcript at 90-91, 97-99, 101-02, 149.

Dr. Lott posits in his Declaration that one possible explanation for the correlation that Dr. Klinkner found between African-American voters and voters being challenged is that “poorer or less educated precincts were more likely to fill out false registration forms.” See Dr. Lott Depo. Exhibit 2 at 3-4, ¶7. Yet, Dr. Lott has no evidence whatsoever to support this purported possible explanation. See Dr. Lott Depo. Transcript

² Dr. Lott also acknowledges the existence of considerable and widespread criticism of his methodologies, and questions about the veracity of his research. See “John Lott’s Mysterious Survey,” Dr. Lott Depo. Exhibit 6; “Double Barreled Double Standards – For years, John Lott has provided a vital scholarly basis to the pro-gun movement. But now his research and his integrity are drawing heavy fire,” Dr. Lott Depo. Exhibit 7; Dr. Lott Depo. Transcript at 131-32, 134, 140-43.

at 91-92. In addition to his admission that he is not aware of any evidence produced by anyone that there in fact are any “false registrations” among the 35,000 names on the challenge list, Dr. Lott concedes that, while it would have been helpful to have, he did not review data on income and education at the precinct levels. See Dr. Lott Depo. Transcript at 47-49, 91-92. Furthermore, income and education levels could not possibly explain the disparate impact that the challenges in this case have on African-Americans, because, as Dr. Lott himself concedes, the income and education levels of the African-American population in all five counties at issue are relatively high. Id. at 89; see also Dr. Lott Declaration, Dr. Lott Depo. Exhibit 2 at 1-2, ¶3.

Furthermore, while Dr. Lott criticizes Dr. Klinkner for not factoring into Dr. Klinkner’s analysis the possibility of “nonpersons” or “fake registrations,” Dr. Lott himself has not done – nor at the time of his deposition did he intend to do – any analysis that would attempt to account for this possibility. Id. at 181-82.

While Dr. Lott levels several criticisms at Dr. Klinkner’s analysis, Dr. Lott does not question the validity of the data upon which Dr. Klinkner relies. Id. at 107, 109-10. Dr. Lott also concedes that when he performed the same analysis that Dr. Klinkner performed, he got the same results that Dr. Klinkner got. Id. at 32.

As explained in Dr. Klinkner’s second Declaration, even when Dr. Klinkner analyzed the data using the various other methodologies suggested by Dr. Lott, the result was the same – the rate of challenges has a statistically significant disparate impact on African American voters.³

³ Dr. Lott acknowledges that experts in the field consider 5% or 10% to be statistically significant. See Dr. Lott Depo. Transcript at 155.

Although the Republican Party of Ohio chose not to make challenges in all 88 Ohio counties, but focused only on five of the counties that are among the highest with respect to African-American voting age and registered voter populations – Cuyahoga, Franklin, Hamilton, Montgomery and Summit – Dr. Lott looked at all 88 Ohio counties in reaching his conclusion that the number of African American is not statistically significant compared to the number of challenges. See Dr. Lott Depo. Transcript at 44, 87-89.⁴

⁴ Although counsel for the Intervenor requested on Friday, October 29, 2004 to be provided with electronic copies of the data that Dr. Lott relied upon in reaching his conclusions, counsel was never provided with that information. At the beginning of his deposition on Saturday, Dr. Lott provided hard copies of two documents that he received from the RNC and a document that he created; he also never provided electronic copies of that data, as requested. See e.g. Dr. Lott Depo. Transcript at 104, 122, 185.

Exhibit 13

DECLARATION OF PROFESSOR PHILIP A. KLINKNER

I, Philip A. Klinkner, Declare Under Penalty of Perjury That The Following Is True And Correct To The Best Of My Knowledge And Belief:

1. My name is Philip A. Klinkner and I am currently the James S. Sherman Associate Professor of Government at Hamilton College in Clinton, NY. I received my Ph.D. in Political Science from Yale University in 1992. My research focuses on American politics, including party and electoral politics, voting behavior, and race and American politics. This research also involves statistical analyses of race and electoral data.
2. I was asked to analyze the relationship between challenged voters and the racial breakdown of the precincts in which they are located in Cuyahoga County and Hamilton County, Ohio.
3. My analysis is based on data provided to me by PENDA HAIR indicating the precinct of all challenged voters in Cuyahoga and Hamilton Counties. This data was then merged with an existing file containing precinct data for total voters, new voters, and the racial breakdown of the voting age population (VAP). This file was generated from a purchased a copy of a file containing the ZipCode +4 and date of registration for each registered voter in Ohio. This file was then combined with data purchased from NCEC containing the voting age population (VAP) racial breakdown for all ZipCodes +4 in Ohio. These files were merged and then collapsed to give me the number of voters, the number of new voters, and the average VAP racial breakdown for each precinct.

1. Analysis of Challenged Voters in Cuyahoga County, Ohio

In my analysis of Cuyahoga County, I found a strong and statistically significant relationship between the number of challenged voters and the race of the precincts in which they were challenged. In other words, challenges are substantially more likely to occur in heavily black precincts. As Table 1 shows, the percentage of voters that are challenged increases as the black composition of the precincts goes up.

Table 1.

| Black% Range | # Challenged | # of new # of Voters | % of new Voters | % of Voters Challenged | % of New Voters Challenged |
|--------------|-----------------|-------------------------|--------------------|---------------------------|----------------------------------|
|--------------|-----------------|-------------------------|--------------------|---------------------------|----------------------------------|

| | | | | | |
|-----------|------|--------|-------|------|-------|
| 00 - 10% | 5165 | 512879 | 52895 | 1.0% | 9.8% |
| 10 - 20% | 1701 | 79682 | 11617 | 2.1% | 14.6% |
| 20 - 30% | 462 | 22244 | 3247 | 2.1% | 14.2% |
| 30 - 40% | 363 | 22685 | 5922 | 1.6% | 6.1% |
| 40 - 50% | 275 | 19470 | 3257 | 1.4% | 8.4% |
| 50 - 60% | 930 | 28580 | 5179 | 3.3% | 18.0% |
| 60 - 70% | 408 | 15232 | 2304 | 2.7% | 17.7% |
| 70 - 80% | 777 | 16866 | 3076 | 4.6% | 25.3% |
| 80 - 90% | 875 | 22735 | 3579 | 3.8% | 24.4% |
| 90 - 100% | 3353 | 118000 | 19069 | 2.8% | 17.6% |

| Black% Range | # Challenged | # of Voters | # of new Voters | % of New Voters | |
|--------------|--------------|-------------|-----------------|-----------------|------------|
| | | | | Challenged | Challenged |
| 0-30%*** | 7615 | 614805 | 67759 | 1.2% | 10.8% |
| 30-100% | 8091 | 243568 | 42386 | 2.9% | 16.5% |

***The percentage of the voting age population that is black in Cuyahoga county is 25%

As Table 1 shows, voters in the most heavily black precincts are nearly three times as likely to be challenged compared to voters in heavily white precincts. Furthermore, this disparity is not explained by the number of new voters in various precincts. New voters in heavily black precincts are nearly twice as likely to be challenged as those in heavily white precincts.

To test this relationship more precisely, I ran two regression models, the first with percent of voters challenged as the dependent variable and the second with the percent of new voters challenged as the dependent variable. In both models, the independent variable was the range of percent black for the precincts. In both models I have weighted for the number of voters so that sets of precincts with smaller numbers of voters do not influence the results. The results are in Tables 2 and 3.

Table 2. Regression Output for Relationship of Race of Precinct to % of Voters Challenged

(sum of wgt is 8.4913e+05)

| Source | SS | df | MS |
|----------|------------|------|------------|
| Model | .100373721 | 1 | .100373721 |
| Residual | .872140315 | 1433 | .000608612 |
| Total | .972514036 | 1434 | .000678183 |

Number of obs = 1435
 F(1, 1433) = 164.92
 Prob > F = 0.0000
 R-squared = 0.1032
 Adj R-squared = 0.1026
 Root MSE = .02467

| challenges-s | Coef. | Std. Err. | t | P> t | [95% Conf. Interval] | |
|--------------|----------|-----------|-------|-------|----------------------|----------|
| bper | .023618 | .0018391 | 12.84 | 0.000 | .0200104 | .0272256 |
| _cons | .0109534 | .0007971 | 13.74 | 0.000 | .0093897 | .012517 |

Table 3. Regression Output for Relationship of Race of Precinct to % of New Voters Challenged

(sum of wgt is 8.4912e+05)

| Source | SS | df | MS | Number of obs = | 1434 |
|----------|------------|------|------------|-----------------|--------|
| Model | 1.55956141 | 1 | 1.55956141 | F(1, 1432) = | 60.27 |
| Residual | 37.0572726 | 1432 | .025877984 | Prob > F = | 0.0000 |
| | | | | R-squared = | 0.0404 |
| | | | | Adj R-squared = | 0.0397 |
| Total | 38.616834 | 1433 | .026948244 | Root MSE = | .16087 |

| challenges-w | Coef. | Std. Err. | t | P> t | [95% Conf. Interval] | |
|--------------|----------|-----------|-------|-------|----------------------|----------|
| bper | .0931291 | .0119964 | 7.76 | 0.000 | .0695968 | .1166614 |
| _cons | .0952987 | .0051996 | 18.33 | 0.000 | .0850992 | .1054983 |

In both models the relationship between the race of precincts and the percent of challenges is positive and statistically significant. In fact, these results show that less 1 time in 1000 will these results be due to random chance, far below the usual standard in social science of 5 times in 100. Overall, each 10 percentage point increase in the black VAP leads to a .2 percentage point increase in percent of challenged voters. In addition, each 10 percentage point increase in the black VAP leads to a .9 percentage point increase in percent of challenged new voters.

2. Analysis of Challenged Voters in Hamilton County, Ohio

In my analysis of Hamilton County, I found a strong and statistically significant relationship between the number of challenged voters and the race of the precincts in which they were challenged. In other words, challenges are substantially more likely to occur in heavily black precincts. As Table 1 shows, the percentage of voters that are challenged increases as the black composition of the precincts goes up.

Table 4.

| Black% Range | # Challenged | # of new Voters | % of new Voters | % of New Challenged Voters |
|--------------|-----------------|--------------------|--------------------|----------------------------------|
|--------------|-----------------|--------------------|--------------------|----------------------------------|

| | | | | Challenged | |
|-----------|------|--------|-------|------------|-------|
| 00 - 10% | 1263 | 335999 | 41072 | 0.4% | 3.1% |
| 10 - 20% | 506 | 44742 | 7161 | 1.1% | 7.1% |
| 20 - 30% | 351 | 28356 | 4901 | 1.2% | 7.2% |
| 30 - 40% | 573 | 26817 | 4973 | 2.1% | 11.5% |
| 40 - 50% | 321 | 16104 | 3045 | 2.0% | 10.5% |
| 50 - 60% | 304 | 20089 | 3646 | 1.5% | 8.3% |
| 60 - 70% | 367 | 14620 | 2851 | 2.5% | 12.9% |
| 70 - 80% | 514 | 14721 | 3137 | 3.5% | 16.4% |
| 80 - 90% | 620 | 19195 | 3934 | 3.2% | 15.8% |
| 90 - 100% | 913 | 29806 | 6792 | 3.1% | 13.4% |

| Black% Range | # Challenged | # of Voters | # of new Voters | % of New Voters | |
|--------------|--------------|-------------|-----------------|------------------------|------------------------|
| | | | | % of Voters Challenged | % of Voters Challenged |
| 0-20%*** | 1765 | 380741 | 48233 | 0.5% | 3.7% |
| 30-100% | 3963 | 169708 | 33279 | 2.3% | 11.9% |

***The percentage of the voting age population that is black in Hamilton county is 21%

As Table 4 shows, voters in the most heavily black precincts are nearly 8 times as likely to be challenged compared to voters in heavily white precincts. Furthermore, this disparity is not explained by the number of new voters in various precincts. New voters in heavily black precincts are more than 4 times as likely to be challenged as those in heavily white precincts.

To test this relationship more precisely, I ran two regression models, the first with percent of voters challenged as the dependent variable and the second with the percent of new voters challenged as the dependent variable. In both models, the independent variable was the range of percent black for the precincts. In both models I have weighted for the number of voters so that sets of precincts with smaller numbers of voters do not influence the results. The results are in Tables 5 and 6.

Table 5. Regression Output for Relationship of Race of Precinct to % of Voters Challenged

(sum of wgt is 3.9956e+05)

| Source | SS | df | MS |
|----------|------------|-----|------------|
| Model | .064149756 | 1 | .064149756 |
| Residual | .26196301 | 710 | .000368962 |
| Total | .326112766 | 711 | .000458668 |

Number of obs = 712
 F(1, 710) = 173.87
 Prob > F = 0.0000
 R-squared = 0.1967
 Adj R-squared = 0.1956
 Root MSE = .01921

| challenges-s | Coef. | Std. Err. | t | P> t | [95% Conf. Interval] | |
|--------------|----------|-----------|-------|-------|----------------------|----------|
| bper | .0301098 | .0022835 | 13.19 | 0.000 | .0256266 | .034593 |
| _cons | .0063248 | .0009425 | 6.71 | 0.000 | .0044745 | .0081752 |

Table 6. Regression Output for Relationship of Race of Precinct to % of New Voters Challenged

(sum of wgt is 3.9956e+05)

| Source | SS | df | MS | Number of obs = 712 | |
|----------|------------|-----|------------|---------------------|--------|
| Model | .822510682 | 1 | .822510682 | F(1, 710) = | 119.82 |
| Residual | 4.87382696 | 710 | .006864545 | Prob > F = | 0.0000 |
| | | | | R-squared = | 0.1444 |
| | | | | Adj R-squared = | 0.1432 |
| Total | 5.69633765 | 711 | .008011727 | Root MSE = | .08285 |

| challenges-w | Coef. | Std. Err. | t | P> t | [95% Conf. Interval] | |
|--------------|----------|-----------|-------|-------|----------------------|----------|
| bper | .1078155 | .0098495 | 10.95 | 0.000 | .0884777 | .1271532 |
| _cons | .0443956 | .0040652 | 10.92 | 0.000 | .0364143 | .0523769 |

In both models the relationship between the race of precincts and the percent of challenges is positive and statistically significant. In fact, these results show that less 1 time in 1000 will these results be due to random chance, far below the usual standard in social science of 5 times in 100. Overall, each 10 percentage point increase in the black VAP leads to a .3 percentage point increase in percent of challenged voters. In addition, each 10 percentage point increase in the black VAP leads to a 1.1 percentage point increase in percent of challenged new voters.

3. Conclusion

This analysis shows that there is a strong and statistically significant relationship between challenged voters and the racial breakdown of the precincts. Moreover, this relationship is not explained by the number of new voters in heavily black precincts since challenges as a percent of new voters is even more closely tied to the race of the precinct.

4. "Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct."

Dated:

10/27/04

Philip A. White
Signature

Exhibit 14

washingtonpost.com

Judge Rebuffs GOP Effort to Contest Voters in Ohio

By Jo Becker
Washington Post Staff Writer
Thursday, October 28, 2004; Page A01

A U.S. District Court judge yesterday effectively ended efforts by Republicans in Ohio to challenge the eligibility of tens of thousands of voters in one of the most closely contested states in this year's presidential race.

Judge Susan J. Dlott in Cincinnati issued an order preventing local election boards from going forward with plans to notify challenged voters and hold hearings until she hears legal arguments tomorrow. But because her ruling means that those election board hearings cannot take place within the time frame state law requires before the election, Dlott's ruling killed the GOP effort that had targeted 35,000 voters, Democratic and Republican party officials said.

David Sullivan, director of the Democratic Party's Voter Protection Program in Ohio, praised the ruling and said the GOP was never able to offer proof that the challenged voters are ineligible. "The Republican assault on tens of thousands of Ohio voters was an unprecedented effort to intimidate voters, especially minorities, but it has backfired," he said.

Mark Weaver, a lawyer for the Ohio Republican Party, said yesterday's ruling does not prevent the party from going forward with plans to place 3,400 monitors in polling places, particularly in heavily Democratic urban areas. The challenges will take place Tuesday instead of being decided beforehand, he said.

States allow political parties to monitor polls and challenge voters' eligibility. In Ohio, the challenge is considered by a bipartisan election board.

"The ironic twist here is that now there will be longer lines [at the polls] because questions about voter eligibility will have to be decided on Election Day, rather than ahead of time," Weaver said.

A spokesman for Ohio's secretary of state, J. Kenneth Blackwell (R), who was named in the lawsuit, said he will not appeal the ruling. Election officials in Cuyahoga County, where most of challenges were filed, said they will not appeal either.

Both parties have been engaged in intense legal wrangling over election laws this year as they look for every possible edge in states where polls show the presidential race too close to call. They have fought over provisional ballots -- given to voters whose names do not appear on rolls at polling sites -- and how to determine their validity and how quickly the ballots should be counted. And they have battled over poll identification rules and procedures for early voting, a process in many states -- such as Florida -- that has already allowed more than 1.3 million people to vote in advance.

Ohio was part of an effort by Republicans in many battleground states to challenge voter registrations as Election Day approaches.

It was the second time that the GOP has lost on the issue. In Nevada, another battleground, Clark County election

Advertisement



officials rejected an attempt this month by the former executive director of that state's GOP to challenge 17,000 voters in the Las Vegas area.

Diott's ruling could alleviate the possibility of massive disruptions in the last days of the campaign. Cuyahoga County, where about 17,000 of the challenged voters reside, had been planning a mass hearing on Saturday.

The legal setback has not deterred GOP officials, who say that challenges are necessary to safeguard the election against fraud.

In Florida, the GOP has filed plans to place poll watchers at 5,000 polling places, spokeswoman Mindy Tucker Fletcher said. Whether those observers will challenge individual voters depends on the circumstances, she said. "If there's something blatant, we may choose to do that," she said.

In Denver, election officials said the Republican Party told them it plans to have 350 poll watchers to challenge voters there. "This is a very organized, very intense effort," said Alan McBeth of the Denver Election Commission. "If it becomes abusive, we may have to step in and say this is out of hand."

Tom Josefiak, the Bush campaign's general counsel, said in a recent interview that challenges would be conducted in a non-intimidating manner that would not disrupt voting.

Democrats, however, argue that the real aim of the challenge program is to keep voters likely to support Sen. John F. Kerry (D-Mass.), particularly minorities, from casting ballots.

Bob Bauer, a lawyer for the Democratic National Committee, said Democrats will also have large numbers of poll watchers. But, he said, "our watchers will be there to help voters, not to hinder them, to answer their questions, not to question them."

In Florida, Republican poll watchers will be disproportionately concentrated in minority precincts, according to a Democratic Party analysis of census data and GOP plans filed in five counties. In Miami-Dade, 59 percent of predominately black precincts will have at least one GOP poll watcher, compared with 37 percent of white precincts.

Although Fletcher did not dispute those numbers, she said that the party will not single out black neighborhoods, but rather heavily Democratic ones. "Those are the places most likely for the Democrats . . . to try to steal the election," she said.

Staff writer Ann Gerhart contributed to this report.

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Exhibit 15

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

DEMOCRATIC NATIONAL
COMMITTEE,

et al.,

Plaintiffs,

v.

REPUBLICAN NATIONAL
COMMITTEE,

et al.

Defendants.

Civil Action No.: 81-3876

JUDGE DICKINSON R.
DEBEVOISE

DECLARATION OF TIMOTHY BURKE

I. Introduction

1. My name is Timothy Burke, and I am chair of the Hamilton County Board of Elections. I am also co-chair of the Hamilton County Democratic Party.
2. I have served as chair of Board for twelve years, and have been involved in local elections in Hamilton County for approximately 35 years. As Board chair, I oversee the work of all elections staff, including poll workers, in Hamilton County.

3. I am intimately familiar with the elections procedures and laws in Hamilton County.
4. Due to my long experience with elections here, I was named an International Supervisor of the first municipal elections in Bosnia in 1997.
5. I am deeply concerned that the presence of a large number of partisan challengers on election day will disrupt the voting process in Hamilton County, and across Ohio, and will result in huge numbers of voters not being able to cast ballots.

II. Procedures For Election Day Challenges

A. Staffing Of The Polling Place

6. In Hamilton County, four poll workers are assigned to each polling place on election day. Each poll worker assigned to a polling place is called a "judge." The Board of Elections hires the judges and there are two Board of Elections staff members responsible for this hiring: one is a Republican (who is responsible for hiring two judges in each precinct) and one is a Democrat (who is responsible for hiring the other two judges in each precinct).
7. One of these four judges is known as the "presiding judge" and is in charge of the polling place. The political party of the candidate for Governor who carried the precinct in the previous election determines who is the presiding judge.

B. Political Party Challengers

8. Ohio law allows political parties to designate challengers who can be stationed in polling places on election day. Each such challenger in a polling place is sworn in on election day by the presiding judge in the polling place.
9. Under Ohio law, these challengers have the right, in good faith, to challenge a voter. They must state that challenge to the presiding judge and must inform the presiding judge as to the grounds for the challenge.
10. The only grounds for a challenge are: (1) the prospective voter is not an American citizen; (2) the prospective voter is not a resident of state; (3) the prospective voter is not a resident of county; (4) the prospective voter is not a resident of the precinct; (5) the prospective voter is not 18; (6) or the prospective voter is impersonating a voter. There are no other grounds for challenge.
11. A challenger may make a challenge orally to the presiding election judge, and need only designate the ground on which the challenge is made (e.g., the voter is not a resident of the precinct). The challenger need not specify evidence in support of the challenge.
12. Once made, a challenge automatically triggers the following process.

C. Challenges Based On Citizenship, Residency and Age

13. As to the first five categories of challenges (i.e., citizenship, residency, and age), the presiding judge is to employ a form developed by the Secretary of State (form 10-U) called the "Affidavit-Oath-Examination of Person Challenged" (Attached as Exhibit A to this declaration).
14. If a challenge is lodged based on any of these grounds, the presiding judge has been instructed by the Secretary of State to remove the voter and the challenger from the line, take them ten feet away, and to administer to the challenged voter the relevant questions and the oath contained in the 10-U form.
15. Each challenged voter is required to answer the questions relevant to the particular challenge made and to sign the oath.
16. If a voter is challenged on any of the first five categories of challenges, and the voter answers the questions contained in form 10-U in a manner indicating that they are qualified to vote in that precinct and signs the oath, the presiding judge (and the presiding judge alone) determines that the person is eligible to vote and allows the person to cast a ballot.

17. If such a challenged voter is on the registration list (also known as the signature book) the voter will vote a regular ballot. If the challenged voter is not on the list, they will vote a provisional ballot.
18. If the voter doesn't answer the questions contained in for 10-U (or if the presiding judge finds that the answers indicate that the voter is not qualified to vote in that precinct), or if the challenged voter does not sign the oath, state law indicates that all of the judges must rule on the challenge.
19. Ohio law (3505.20) would seem to provide that in such case, if the majority of judges believe the person is not entitled to vote the voter would receive no ballot. However, our Board staff has been advised by the Secretary of State's office that individuals in this circumstance should be provided a provisional ballot.
20. Under O.R.C. 3505.20, a challenged voter in the circumstance described in paragraph 16 has been adjudged ineligible to vote and such decision is final. Based on this, it is my understanding that if such a voter is provided with and casts a provisional, the provisional ballot would not be counted.

**1. Challenge Based On Allegation That Voter Does Not Live In Precinct
Where They Offer To Vote**

21. If a voter is challenged on the ground that they no longer live in the precinct where they offer to vote, and the presiding judge determines that this is true, that voter is entitled to vote in the precinct where they now live, and the presiding will so inform the voter. A voter successfully challenged on these grounds, however, will not be removed from the registration rolls unless the other requirements of 42 U.S.C. 1973gg-6(d) and O.R.C. 3503.21 are met.

22. The Republican Party has announced its intention to challenge voters to whom a piece of mail was sent but then returned as being undeliverable. 35,000 challenges have been filed in the state of Ohio apparently based on such returned mail, which alleged that the voters were not entitled to vote and demanded that their names be removed from the registration rolls.

23. If someone is challenged at the polling place on the ground that they are not a resident of the precinct in which they offer to vote, the process for resolving the challenge is that which I outlined in paragraphs 13-20 above. The process would not change if the challenger presented the judge with a list of voters to whom mail was sent and returned as undeliverable.

D. Challenges Based On Impersonating A Voter

24. If a potential voter is challenged on the ground that they are impersonating a voter, the process is different than the process for citizenship, residency, and age challenges described above.
25. A voter challenged on the ground that they are impersonating a voter is asked to sign a piece of paper. The four election judges then determine – by majority vote - whether the signature matches the voter's signature in the signature book. This determination is made by majority vote of all the judges. In making their determination, the judges may consider evidence in addition to the signature match as to the identity of the voter.
26. If the judges determine that the prospective voter is who she says she is, she will be given a regular ballot.
27. If the judges determine that the prospective voter is not who she says she is, the Secretary of State has instructed the Board staff that the voter shall be given a provisional ballot.
28. Under Ohio law, a voter challenged on the ground that they are impersonating a voter is entitled to appeal such a decision of the judges to the county Board of

Elections. If the Board of Elections determines that the voter was in fact who she said she was, the provisional ballot would be counted.

E. Hamilton County Policy and Ambiguity in State Law

29. Because of the concern over the potential for a large number of challengers in polling places on election day, two members of our board (myself and my Republican counterpart) held a meeting with attorneys for the Kerry and Bush Presidential campaigns to discuss policies and procedures that would apply to challengers in Hamilton County.

30. Following that meeting, on October 22, 2004 the Hamilton County Board of Elections adopted the "Witnesses and Challengers Policy" (Attached as Exhibit B), which sets forth the procedures outlined above.

31. The Hamilton County policy represents our best interpretation of Ohio law and of the guidance we have received from the Secretary of State, particularly in the October 20, 2004 memorandum from that office regarding "Challenges and Witnesses." (Attached as Exhibit C).

32. I understand, however, that other counties may interpret Ohio law and/or the Secretary of State's guidance in a slightly different manner.

33. For example, if a voter is challenged on the ground of not living in the precinct, O.R.C. 3505.20 states that "[t]he presiding judge shall put such other questions to the person challenged under respective heads designated by this section, as are necessary to test the person's qualification as an elector," and states further the voter may be deemed ineligible to receive a regular ballot "if for any other reason a majority of judges believes the person is not entitled to vote."

34. The Secretary of State's memorandum repeats this language in the section titled "Decision on Challenge."

35. A different interpretation of Ohio law and the Secretary of State's memorandum could potentially lead counties to develop challenge procedures that would require even more extensive involvement of the election judges in each challenge and add substantially to the disruptive effect of such challenges (see Section IV below).

F. Secretary of State's Proposal to Exclude All Challengers

36. On October 29, 2004 the Ohio Secretary of State issued a statement regarding challengers at Ohio's polling places. He stated that "As Secretary of State it is my responsibility to conduct Ohio's elections in a manner as open and accessible as possible." Noting that several lawsuits have been filed "against the statutes that allow parties to place challengers in polling places," he stated that "[w]hile I do not agree there is any discriminatory intent or result from these statutes, I do

believe a full airing of these issues cannot be completed prior to Tuesday's election."

37. The Secretary of State then "instructed the Attorney General to offer the following recommendation to the federal courts in Hamilton and Summit counties for resolution of these matters now: All challengers of all parties shall be excluded from polling places throughout the state."

38. It is my understanding that despite the Secretary's statement, this issue remains unresolved at the state-wide level. The Ohio Attorney General has rejected the Secretary of State's proposal to ban challengers.

III. Preparation Of Poll Workers For Challenges On Election Day

39. As noted, the Hamilton County Board has adopted a "Witnesses and Challengers Policy" to address our concern over the potential for a large number of challengers in polling places. All election judges have been provided with the relevant information from that policy.

40. In addition, all of our election judges are undergoing pre-election day training, and we have included in their training information regarding the challenge process. Approximately ½ hour total time is dedicated to training judges on the challenge process.

41. Nonetheless, I am not confident that myself or my fellow board members, or the election judges, are prepared to deal with the high number of challengers we are expecting.
42. Traditionally, in Hamilton County, parties have named their precinct executives (who are also known as central committee members) as challengers, but to my memory neither of the parties have ever used challengers in the polling places to challenge voters.
43. Moreover, during the course of the trainings, our election judges were asked whether any of them have ever experienced challengers making challenges in their polling places. The near unanimous response has been "no." For the overwhelming majority of our poll workers, even those who have worked at polling places for more than 30 years, this election would mark the first time they have ever encountered a challenger making challenges in a polling place.
44. It is therefore my belief that none of our presiding judges have ever had to administer a 10-U form in the past, or facilitate the resolution of challenges by challengers. Likewise, none of our non-presiding judges have ever participated in the resolution of challenges by challengers before.

IV. Impact Of Election Day Challenges On The Voting Process

A. Disruption Of Voting Process, Lines, and Reduction Of Votes Cast

45. Despite the training we are providing, I am very concerned that our election judges will be confused by the challenge process, that their time and attention will be consumed by processing challenges, and that the filing of challenges will disrupt voting on election day.
46. When a challenge is made, the attention of the presiding judge must be devoted to the challenge instead of to the processing of voters. In the event that a challenged voter's answers to the 10-U questions produce uncertainty about their eligibility to vote, or in the event that a challenged voter does not sign the 10-U oath, all four election judges (i.e., all the poll workers) may also have to get involved in processing the challenge. This would effectively shut down the processing of voters until the challenge is resolved.
47. Repeated challenges made at a polling place will accordingly have the effect of slowing down the processing of all voters, even those who are not themselves challenged.
48. This slowing down of the process will lead to long lines at the polling place, lines that will discourage many voters from voting.

B. Intimidation of Voters

49. The challenge process is also likely to intimidate voters – both those who are themselves challenged (whether or not they are eligible to vote) and voters who are not challenged.
50. Most voters will have heard news reports that hundreds of challengers will be in polling places to combat “voter fraud.” The claims of voter fraud have often been associated with people who have moved since they registered to vote. This, in and of itself, may discourage some eligible voters from turning out on election day, particularly voters who have moved since they registered and yet remain fully eligible to vote.
51. Those voters who do come to the polls will observe challengers questioning the eligibility of other voters ahead of them in line, often on the ground that they are not a resident of that precinct. This may discourage many voters from voting, particularly new voters who may not know for sure in which election precinct they live.

52. Moreover, voters who are challenged will be required to have an oath administered to them and they must sign a form which states in bold letters **"WHOEVER COMMITS ELECTION FALSIFICATION IS GUILTY OF A FELONY OF THE FIFTH DEGREE."** I have no doubt that this form will discourage eligible voters from voting.

C. Heightened Impact on African American Voters

53. I believe that low-income and minority voters are most likely to be dissuaded from voting as a result of these challengers.

54. First, I have examined the challenger designations filed by the Republican Party, and it is clear that Republican challengers will be concentrated in highly African American precincts. For the reasons stated above, the presence of these challengers on election day will likely have the effect of reducing the number of African American voters in this election.

55. Moreover, my experience tells me that the African-American community is most likely to be intimidated by a combination of the claims of voter fraud and the presence of challengers at the polls because, if challenged, they may very well feel that they themselves are being accused of voter fraud.

56. In these communities, where residents are more likely to have had negative encounters with the law and law enforcement, the prospect of having to

effectively run a gauntlet of challengers – challengers sent to combat “fraud” – will have the effect of discouraging African Americans from voting.

57. Likewise, the prospect of having to sign a form that warns in bold letters of a **“FELONY OF THE FIFTH DEGREE”** is likely to scare voters – even those fully eligible to vote - and dissuade them from voting.

58. I am also extremely concerned about challenges based on residency because of the nature of the questions contained in Form 10-U and the potential for misunderstanding by either the presiding judge or the prospective voter. For example, question (c)(3) on the 10-U form asks “When you came into this precinct, did you come for a temporary purpose merely or for the purpose of making it your home?”

59. The United States Sixth Circuit Court of Appeals has already clearly ruled that a college student is entitled to register and vote where they are going to college even though any parent sending a child to college certainly hopes that the stay at college is “for a temporary purpose.” Thus, voters may be eligible to vote even if they think they are living in a precinct temporarily.

60. I believe that the language of this question has a great potential to be misunderstood and misapplied everywhere, but particularly in low-income

communities with lower levels of educational achievement and where residents are likely to be tenants rather than homeowners and move more frequently.

V. Conclusion

61. I am deeply concerned about the impact that election-day challenges will have on voting in Hamilton County and across Ohio. Based on the processes we must follow when a challenge is filed and the inexperience of our election judges in handling election-day challenges, I believe that the presence of these challengers will disrupt voting and result in eligible voters not casting ballots.

62. Based on the allocation of Republican poll watchers to African American precincts and the considerations expressed in paragraphs 53-60, moreover, I believe that these effects will be particularly pronounced in precincts with high numbers of African American voters.

Pursuant to 28 U.S.C. 1746 and Ohio Stat. 2921.11, I declare under penalty of perjury that I have read the foregoing and that the facts stated in it are true and correct.

Dated: 10/30/04

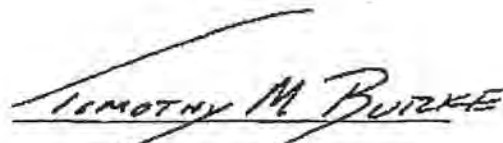

Timothy Burke

EXHIBIT A

Affidavit-Oath-Examination of Person Challenged
Revised Code Section 3505.20

The State of Ohio, _____ County, ss:

I, _____ the undersigned, swear or affirm that I will fully and truly answer all of the following questions put to me, touching my place of residence and my qualifications as an elector at this election.

(Check all that apply) Being challenged as unqualified on the ground(s) that:

(A) _____ The person is not a citizen, the following questions shall be put:

(1) Are you a citizen of the United States? _____

(2) Are you a native or naturalized citizen? _____

(3) Where were you born? _____

If a naturalized citizen, then

¹ I am the identical person named in the certificate of my naturalization herewith produced for the inspection of the Judges of Election.

Or,

I was naturalized on the _____ day of _____, _____, at _____.
I have had a certificate of my naturalization which is lost, destroyed or beyond my power to produce to the Judges.

Or,

By reason of the naturalization of my parent(s) _____ I have become a Citizen of the United States and my parent(s) _____ was naturalized on the _____ day of _____, _____ at _____.

(B) _____ The person is not a resident of the state for thirty days immediately preceding election, the following questions shall be put:

(1) Have you resided in this state for thirty days immediately preceding this election?

If yes:

(a) Where have you resided?

(b) Names of two persons who know your place of residence.

(1) _____

(2) _____

¹ Cross out words or lines not applicable so that statements and answers made shall be factual.

(2) Have you been absent from this state within the thirty days immediately preceding this election?

If yes:

(a) Have you continuously resided outside this state for a period of four years or more?

(b) Did you, while absent, look upon and regard this state as your home?

(c) Did you, while absent, vote in any other state?

(C) _____ The person is not a resident of the county or precinct where he/she offers to vote, the following questions shall be put:

(1) Do you now reside in this county? _____

(2) Do you now reside in this precinct? _____

(3) When you came into this precinct, did you come for a temporary purpose merely or for the purpose of making it your home? _____

(D) _____ The person is not of legal voting age, the following question shall be put:

(1) Are you eighteen years of age or more to the best of your knowledge and belief?

Other Questions and Answers:

(Refusing or failing to answer any question fully or refusing to sign this form will result in the loss of your right to vote.)

Challenged Voter's Signature _____

Sworn to before me and signed in my presence, this _____ day of _____, _____
(Month) (Year)

Presiding Judge of Election, _____

Precinct _____

Township or Ward and City or Village _____

The Presiding Judge shall put such other questions to the persons challenged as may be necessary to test his qualifications as an elector at the election. R.C. 3505.2

**WHOEVER COMMITS ELECTION FALSIFICATION IS GUILTY
OF A FELONY OF THE FIFTH DEGREE**

EXHIBIT B

WITNESSES AND CHALLENGERS POLICY
Adopted by Hamilton County Board of Elections
October 22, 2004

The following is the policy of the Hamilton County Board of Elections regarding witnesses and challengers in the November 2, 2004 Election. This serves to supplement the memorandum from the Secretary of State's Office dated October 20, 2004, which is attached hereto.

- 1) Witnesses and challengers must be Ohio electors, but may be from outside of Hamilton County.
- 2) Challengers are election officials and therefore may cast absentee ballots.
- 3) The signatures of Party officials on the certifications of witnesses or challengers need not be original but may be photocopied, stamped or faxed, but only with the authority and approval of the involved Party officer.
- 4) Witnesses are not appointed at precincts but only for activities at the Board. A challenger may remain in the polling place after the close of voting to observe the process.
- 5) A challenger may serve in that capacity for more than one precinct where there is more than one precinct located in the same polling place.
- 6) The initial names of all witnesses and challengers must be submitted to the Hamilton County Board of Elections office by no later than Friday, October 22nd at 4:00 p.m. Changes in that list can be made up until 4:00 p.m. on Monday, November 1st, but changes can only be made in those precincts in which someone was named by October 22nd.

7) Conduct at the Polls:

- a) Challengers may not campaign or wear any candidate, issue or Party identification inside the polling place;
- b) Challengers may not touch any of the election equipment or supplies;
- c) Challengers may not talk to voters in the polling place;
- d) A challenger who desires to bring a challenge or to call attention to any issues he or she believes should be dealt with in the polling place shall do so by addressing the presiding judge or, if the presiding judge is not available any of the other judges, in a polite professional manner;
- e) A challenger must have a good faith basis for challenging a voter² and may not blanket challenge or randomly challenge voters;
- f) The challenger may challenge a voter only for the following reasons:
 - i) lack of citizenship;
 - ii) non-residency in the state;
 - iii) non-residency in the county;
 - iv) non-residency in the precinct (this challenge may depend on developments in the pending litigation);
 - v) not of legal voting age; or
 - vi) impersonating an elector.

The challenger shall state which of these reasons apply to the challenge:

- g) If challenged for any of the reasons stated in i) through iv) the prospective voter shall be provided with a form 10-U and the presiding judge or an assigned judge shall ask the questions of that prospective voter provided on the form that apply to the challenge being made. If the voter is in the signature book and voter responds to those questions with answers indicating that they are qualified to vote and signs the form under oath, they shall be given a regular ballot, be permitted to vote that ballot and the ballot shall be deposited in the ballot box. If the prospective voter's name is

not in the signature book, but the voter is otherwise qualified to cast a provisional ballot, if that voter is challenged, he or she shall complete the Form 10-U and if their answers indicate they are qualified to vote and they sign the form under oath, they shall be instructed to cast a provisional ballot. Such provisional voters shall also complete the provisional ballot envelope and their ballot shall be placed in the envelope after it has been voted and shall then be deposited in the ballot box.

- h) If the basis for challenging a voter is that they are impersonating an elector, the prospective voter shall be asked to sign their name on a card or piece of paper provided to them by the presiding judge or judge. The presiding judge and judges shall then compare that signature to the signature in the signature book. The presiding judge and judges shall determine based upon the signature offered by the prospective voter and any other documentation the prospective voter chooses to provide, whether or not the prospective voter is permitted to vote. If the presiding judge and judges determine that the voter is not allowed to vote, the voter shall be advised that they may appeal that determination to the Hamilton County Board of Elections.
- i) The presiding judge or judges may move a challenged voter away from the sign-in table to any area no less than 10 feet from the poll worker table while the judge and voter are completing the Form 10-U so that the processing of voters in line may continue.
- j) Challengers shall not use cell phones in the polling place.
- k) Challengers must follow the direction of the presiding judge. A Presiding Judge must recognize the right of Challengers to perform the duties conferred on Challengers under Ohio law. A presiding judge may remove a challenger from the polling place who the presiding judge deems to be disruptive following the process outlined in the attached Secretary of State's Memorandum of October 20, 2004..
- 8) By 4:00 p.m. on Friday, October 22nd, parties desiring to appoint witnesses for operations at the Board of Elections shall name those witnesses on the lists filed with the Board of Elections. Names of witnesses to procedures at the Board of Elections can be changed by filing the corrected name with

the Board of Elections by 4:00 p.m. on the day prior to the operation they are intended to witness. The operations which may be witnessed include:

- a) The preparation of the AV ballots which will begin on Monday, October 25th and continue on a daily basis until the election. Absentee ballots that are challenged shall be kept in the secrecy envelope until the Board has determined the challenge;
 - b) The Election Night receipt of ballots on the first floor of the building and their preparation for counting;
 - c) The Election Night count in the counting room on the third floor;
 - d) The preparation and handling of provisional ballots in the ten days following the election;
 - e) The official count:
 - i) at the tables where the ballots are reviewed;
 - ii) in the counting room.
 - f) Witnesses to Post Election Night activities shall be accepted pursuant to the Ohio Revised Code.
- 9) The Director and Deputy Director, in consultation with the Board of Elections, shall determine the number of witnesses who may be present for each operation and shall do so giving consideration to the space available and the ability to efficiently and accurately complete the process involved. Witnesses shall not handle any ballots nor the absentee ballot secrecy envelopes or the provisional ballot secrecy envelopes.

N:\WTPBDELECT\Misc\Witnesses and Challengers.TMB.wp6-rv

EXHIBIT C



Ohio Secretary of State J. Kenneth Blackwell
Elections Division - 180 E. Broad St., 15th Floor, Columbus, OH 43215
Tel. (614) 466-2685 Fax (614) 752-4360 e-mail: election@sos.state.oh.us

MEMORANDUM

TO: All County Boards of Elections

FROM: Pat Wolfe, Director of Elections
Michael Sciorino, President of Ohio Association of Elections Officials (OAE)

DATE: October 20, 2004

RE: Challenger and Witnesses

CHALLENGER & WITNESS GUIDELINES

As election day approaches, many boards will be asked for the forms to appoint and certify challengers and witnesses. R.C. 3505.21 and R.C. 3506.13 authorize the appointment of eligible electors to serve as challengers and/or witnesses of elections. The elector need not live in the precinct where appointed. The statutes set forth:

- The function of challengers and witnesses.
- Who may appoint challengers and witnesses.
- Who may serve as a challenger and/or witness.
- The appointment process and deadlines.

The Ohio Association of Elections Officials (OAE) has recommended policy and procedures for handling challengers at the polling place which are included in this memorandum.

Function

Challengers may be appointed for each polling place (including the board of elections' office), and witnesses for each tabulating location, as provided in R.C. 3505.21 and R.C. 3506.13. The same person may serve as both a challenger and a witness.

• Challengers

- **While Polls are Open:** Challengers are allowed to be in the polling place while the polls are open. A challenger may challenge (prior to the issuance of a ballot), for good cause, the right to vote of anyone who appears to vote. A challenge may be based on the person's citizenship, age, registration, residency in the precinct and, if the election is a partisan primary, political party affiliation. (R.C. 3505.21)
- **After the Polls Close:** Challengers are allowed to remain in a polling place *after* the polls close if ballots are not counted in that polling place. Challengers may observe the processing of the ballots including the sealing and signing of the envelopes and/or containers holding the voted ballots. Challengers are not allowed to touch or handle ballots or any other election materials, nor question the actions of the election officials. (R.C. 3506.13)

o **Witnesses**

Witnesses are allowed to observe the counting of ballots. (Thus, if ballots are not counted at a precinct polling place, then witnesses shall not be appointed to that polling place.) Witnesses are not allowed to touch or handle ballots or any other election materials, nor question the actions of the election officials.

Appointment

All challengers and witnesses must be appointed in writing on a "Notice of Appointment or Amendment of Appointment of Witnesses and Challengers" (Form No. 214) prescribed by the Secretary of State.

1. **By a Political Party**

Notice of appointment signed by the central committee chairperson and secretary, and filed with the board of elections.

2. **By a Group of Five or More Candidates**

Notice of appointment signed by at least five candidates and filed with the board of elections.

3. **By a Committee Supporting or Opposing a Ballot Issue**

Petitions to be recognized as committee to appoint challengers (Form No. 219) and witnesses (Form No. 220), and Notice of appointment by duly recognized ballot issue committee.

Eligibility/Restrictions

No uniformed peace officer as defined by R.C. 2935.01, no uniformed state highway patrol trooper, no uniformed member of any fire department, no uniformed member of the armed services, no uniformed member of the organized militia, no person wearing any other uniform and no person carrying a firearm or other deadly weapon shall serve as a witness or challenger.

A candidate may not serve as a challenger or witness *unless* the candidate (a) also is a member of the party controlling committee and (b) has been appointed by the party.

• **Number of Challengers/Witnesses**

No candidate shall be represented by more than one challenger and one witness at any one polling place except that a candidate who is a member of a party controlling committee, as defined in R.C. 3517.03, may serve as a witness or challenger.

In no case shall more than six challengers and six witnesses be appointed for any one election in any one precinct. If more than three questions are to be voted on, the committees which have appointed challengers and witnesses may agree upon not to exceed six challengers and six witnesses, and the judges of elections shall appoint such challengers and witnesses. If such committees fail to agree, the judges of elections shall appoint six challengers and six witnesses from the appointees so certified, in such manner that each side of the several questions shall be represented.

Filing Deadline

By 4 p.m. of the 11th day (October 22) before the election, any political party, group of candidates or issue committee appointing challengers or witnesses shall file with the board of elections a properly completed "Notice of Appointment" (Form No. 214) containing the names and addresses of its appointees and the polling places at which they shall serve.

Deadline to Amend Appointments

The deadline for amending challenger and witness appointments is 4 p.m. the day before the election; i.e., Monday, November 1, 2004.

Certificate of Appointment

Each challenger and witness shall receive from his or her appointing authority the appropriate Secretary of State-prescribed "Certificate of Appointment" (see Form Nos. 215, 216, 217, 218, 221 and 222.) That certificate must be filed with the presiding judge of the polling place on election day.

Appointments and certifications must be made in writing by 4 p.m. on October 22, 2004, using the appropriate forms prescribed by the Secretary of State:

| Form # | Description |
|--------|--|
| 214 | Notice of appointment or amendment of appointment of witnesses and challengers |
| 215 | Certificate of appointment of challenger - executive or central committee of a political party |
| 216 | Certificate of appointment of witness - executive or central committee of a political party |
| 217 | Certificate of appointment of challenger - five or more candidates |
| 218 | Certificate of appointment of witness - five or more candidates |
| 219 | Petition to be recognized as committee to appoint challengers - measure submitted |
| 220 | Petition to be recognized as committee to appoint witnesses and challengers - measure submitted |
| 221 | Certificate of appointment of challenger - duly recognized committee advocating/opposing a measure |
| 222 | Certificate of appointment of witness - duly recognized committee advocating/opposing a measure |

Challenges to a Person's Right to Vote at the Polling Place - R.C. 3505.20**Who May Challenge**

R.C. 3505.20 provides that the right of a person to vote on election day may be challenged, for good cause, by any of the following persons:

- o Any challenger (appointed pursuant to R.C. 3505.21)
- o Any elector then lawfully in the polling place
- o Any judge or clerk of elections.

Procedure

- o **If the Board of Elections Already Has Ruled on the Person's Eligibility**

If the board of elections has ruled on the question presented by a challenge prior to election day pursuant to R.C. 3501.11(Q), R.C. 3503.24, R.C. 3505.19 or any other section of law, its finding and decision shall be final and the presiding judge shall be notified in writing of that decision.

- o **If No Prior Ruling by the Board of Elections on the Person's Eligibility**

If the board has not ruled, the question shall be determined as set forth in R.C. 3505.20.

Form

SoS No. 16-U Affidavit/oath/examination of person challenged at polls on election day (RC 3505.30)

Oath

If any person is so challenged as unqualified to vote, the presiding judge shall administer the following oath to the challenged person: "You do swear or affirm that you will fully and truly answer all of the following questions put to you, touching your place of residence and your qualifications as an elector at this election?"

Grounds for Challenge

1. Not a U.S. Citizen - R.C. 3505.20(A)

If the person is challenged as unqualified on the ground that the person is not a citizen, the judges shall put the following questions:

- (1) Are you a citizen of the United States?
- (2) Are you a native or naturalized citizen?
- (3) Where were you born?

If the person offering to vote claims to be a naturalized citizen of the United States, the person shall, before the vote is received, either:

- o Produce for inspection of the judges a certificate of naturalization and declare under oath that the person is the identical person named therein, or
- o State under oath when and where the person was naturalized, that the person has had a certificate of the person's naturalization, and that it is lost, destroyed, or beyond the person's power to produce to the judges.

If the person states under oath that, by reason of the naturalization of the person's parents or one of them, the person has become a U.S. citizen, and when or where the person's parents were naturalized, the certificate of naturalization need not be produced.

2. Not a Resident of Ohio for 30 days Immediately Before the Election - R.C. 3505.20(B)

If the person is challenged as unqualified on the ground that the person has not resided in this state for 30 days immediately preceding the election, the judges shall put the following questions:

- (1) Have you resided in this state for thirty days immediately preceding this election?
If so, where have you resided? Name two persons who know of your place of residence.
- (2) Have you been absent from this state within the 30 days immediately preceding this election? If yes, then the following questions:
 - (a) Have you continuously resided outside this state for a period of four years or more?
 - (b) Did you, while absent, look upon and regard this state as your home?
 - (c) Did you, while absent, vote in any other state?

3. Not a Resident of the County or the Precinct - R.C. 3505.21(C)

If the person is challenged as unqualified on the ground that the person is not a resident of the county or precinct where he offers to vote, the judges shall put the following questions:

- (1) Do you now reside in this county?
- (2) Do you now reside in this precinct?
- (3) When you came into this precinct, did you come for a temporary purpose merely or for the purpose of making it your home?

4. Not 18 years old by Election Day - R.C. 3505.20(D)

If the person is challenged as unqualified on the ground that the person is not of legal voting age, the judges shall put the following question: "Are you 18 years of age or more to the best of your knowledge and belief?"

Decision on Challenge

The presiding judge shall put such other questions to the person challenged under respective heads designated by this section, as are necessary to test the person's qualifications as an elector at the election.

- **Failure or Refusal to Answer**

If a person challenged refuses to answer fully any question put to the person, is unable to answer the questions as they were answered on the registration form by the person under whose name the person offers to vote, refuses to sign the person's name or make the person's mark, or if for any other reason a majority of the judges believes the person is not entitled to vote, the judges shall refuse the person a ballot.

- **Failure to Qualify**

If a person is disqualified under R.C. 3505.20(C) because the person does not now reside in the county or precinct, the presiding judge shall inform the person of the person's right to vote in the person's proper county or precinct of residence and instruct the person to contact the appropriate board of elections for information concerning the location of the person's voting precinct.

Decision is Final

The decision of said judges shall be final as to the right of the person challenged to vote at such election.

Policy and Procedures by the Ohio Association of Election Officials (OAE)

Because statutes do not specify the procedures and limitations for challenging voters, and because it is widely anticipated that challenger confusion could cause undue delays in voting, it is necessary to develop a policy for dealing with challenges posed at the precinct. The goal of this policy is to provide for the statutory rights of the challengers, while maintaining order in the polling location.

Challenger Interference

Challengers may not interfere with the voting process or unnecessarily delay it. For example, if a challenger challenges so many voters that his or her activities slow down the voting process or intimidate voters, then the presiding judge should take immediate action including expelling him or her from the polling place. If necessary, the presiding precinct judge shall follow the steps set forth below:

- The presiding precinct judge shall orally warn the challenger that his/her actions are jeopardizing the voters' constitutional right to cast a ballot.
- If a challenger again persists in delaying voting, the presiding precinct judge shall notify the Board of Elections director and deputy director of his or her decision to remove the challenger from the voting location.

Initiating the Challenge

- Challengers shall remain stationed behind the table where poll workers are seated.
- When a challenger wishes to challenge a voter, they shall do so by notifying the presiding judge and shall state the reason for the challenge.

- o Whenever possible, the presiding judge shall move the challenged voter to an area no less than 10 feet from the poll worker table that will not obstruct other voters.

Presiding Judge Duties and Decision

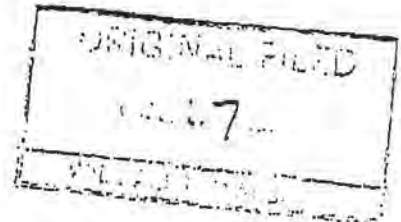
- o The presiding judge shall ask the appropriate questions by administering Form 10-U.
- o The presiding judge shall put such other questions to the person challenged under respective heads designated by this section, as are necessary to test the person's qualifications as an elector at the election.
- o If a person challenged refuses to answer fully any question put to the person, is unable to answer the questions as they were answered on the registration form by the person under whose name the person offers to vote, refuses to sign the person's name or make the person's mark, or if for any other reason a majority of the judges believes the person is not entitled to vote, the judges shall refuse the person a ballot.
- o The decision of said judges shall be final as to the right of the person challenged to vote at such election.

Exhibit 16

7-29-87

154

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY



DEMOCRATIC NATIONAL COMMITTEE,

Plaintiff,

v.

REPUBLICAN NATIONAL COMMITTEE,

Defendant.

Hon. Dickinson R. Debevoise
Civil Action No. 86-3972

SETTLEMENT STIPULATION AND
ORDER OF DISMISSAL

Whereas, on November 1, 1982, this Court entered a Consent Order in Democratic National Committee, et al. v. Republican National Committee, et al., Civil Action No. 81-3876 ("Consent Order"). The Democratic National Committee ("DNC"), Republican National Committee ("RNC") and others were parties to the settlement agreement incorporated in and adopted as the Consent Order. The Consent Order remains in full force and effect;

Whereas, during the course of the case, the parties have engaged in extensive discovery from each other and third parties. More than 50 depositions have been taken and thousands of documents have been examined;

Whereas, the RNC and DNC recognize the importance of encouraging citizens to register and vote and the importance of not hindering or discouraging qualified voters from exercising their right to vote;

Whereas, the RNC and DNC recognize the importance of preventing and remedying vote fraud where it exists;

Whereas, the RNC and DNC recognize the importance of neither using, nor appearing to use, racial or ethnic criteria in

connection with ballot integrity, ballot security or other efforts to prevent or remedy suspected vote fraud;

It is therefore ordered upon the agreement and stipulation of the parties and all prior proceedings herein that as to the RNC and DNC the Consent Order is amended to specifically provide:

A. "Ballot security" efforts shall mean ballot integrity, ballot security or other efforts to prevent or remedy vote fraud.

B. To the extent permitted by law and the November 1, 1982 Consent Order, the RNC may deploy persons on election day to perform normal poll watch functions so long as such persons do not use or implement the results of any other ballot security effort, unless the other ballot security effort complies with the provisions of the Consent Order and applicable law and has been so determined by this Court.

C. Except as provided in paragraph B above, the RNC shall not engage in, and shall not assist or participate in, any ballot security program unless the program (including the method and timing of any challenges resulting from the program) has been determined by this Court to comply with the provisions of the Consent Order and applicable law. Applications by the RNC for determination of ballot security programs by the Court shall be made following 20 days notice to the DNC which notice shall include a description of the program to be undertaken, the purpose(s) to be served, and the reasons why the program complies with the Consent Order and applicable law.

Until further order of the Court, the Court retains jurisdiction to make the determinations set forth above.

Except as provided herein, the RNC and DNC respectfully request that the above-captioned case be dismissed with prejudice upon the order of the Court with each to pay its own costs.

IT IS SO STIPULATED:

David Boies

David Boies
Rodney L. Stenlake
G. Elaine Wood
CRAVATH, SWAINE & MOORE
One Chase Manhattan Plaza
New York, New York 10005
(212) 422-3000

Douglas S. Eakeley
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Robert J. Gilson
RIKER, DANZIG, SCHERER,
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Attorneys for Plaintiff
Democratic National Committee

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Thomas F. Campion
Thomas F. Campion
James M. Altieri
SHANLEY & FISHER
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Morristown, New Jersey 07960
(201) 285-1000

Attorneys for Defendant
Republican National Committee

AND IT IS SO ORDERED this 27 day of July, 1987.

s/ Debevoise
Dickinson R. Debevoise, U.S.D.J.

Exhibit 17

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

DEMOCRATIC NATIONAL COMMITTEE,
NEW JERSEY DEMOCRATIC STATE
COMMITTEE, VIRGINIA L.
PEGGINS, and LYNETTE MONROE,

Plaintiffs,

v.

REPUBLICAN NATIONAL COMMITTEE,
NEW JERSEY REPUBLICAN STATE
COMMITTEE, ALEX HURTADO,
RONALD C. KAUFMAN and JOHN A.
KELLY,

Defendants.

Civil Action No. 81-3876
Hon. Dickinson R. Debevoise

FILED

NOV 1 1982

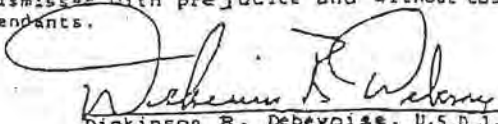
U.S. DISTRICT COURT
NEW JERSEY
CLERK

CONSENT ORDER

This matter having been brought before the Court by Plaintiffs Democratic National Committee ("DNC"), New Jersey Democratic State Committee ("DSC"), Virginia L. Figgins and Lynette Monroe, and by Defendants Republican National Committee ("RNC"), New Jersey Republican State Committee ("RSC"), John A. Kelly, Ronald Kaufman and Alex Hurtado, for the entry of a Consent Order disposing of all claims which have been raised and which could have been raised by way of complaint, counterclaim or crossclaim in the above-entitled matter, and the parties having consented to the entry of this order, and the Court having found good cause, it is on this 1st day of November, 1982,

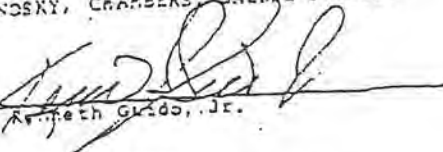
ORDERED that the annexed settlement agreement between certain plaintiffs and certain defendants, without any finding by this Court of, and without any admission of, liability or wrongdoing by them or by any other person or entity be, and the same hereby is adopted by this Court as its final order in the above-entitled matter; and it is

FURTHER ORDERED that, as a result of the amicable resolution of this matter, Plaintiffs' Amended Complaint be, and the same hereby is, dismissed with prejudice and without costs as against all named Defendants.

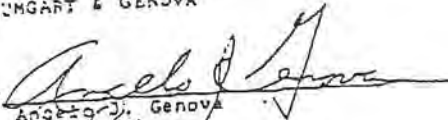

Dickinson R. Debevoise, U.S.D.J.

CONSENT AS TO FORM AND ENTRY:


SEIDENSKY, CHAMBERS, SACHSE & GUIDO

By 
Ar. Fred Guido, Jr.

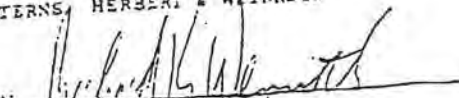
BAUMGART & GENOVA

By 
Angelo J. Genova
Attorneys for Plaintiffs


SHAWLEY & FISHER

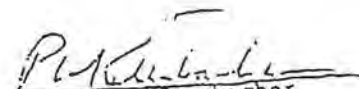
By 
Thomas F. Campion
Attorneys for Defendants
Alex Hurtado and Ronald C.
Kaufman

STERN, HERBERT & WEINROTH

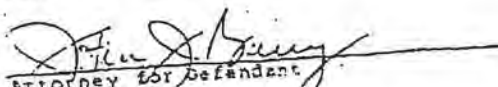
By 
Richard M. Weinroth
Attorneys for Defendant
Republican National Committee

STRYKER, TAMS & DILL

By 
William J. Miller
Attorneys for Defendant
New Jersey Republican State
Committee


Philip D. Kaitenbacher
Chairman, Republican
State Committee

JOHN J. BARRY, ESQ.


Attorney for Defendant
John A. Kelly

SETTLEMENT AGREEMENT

WHEREAS, the Democratic National Committee ("DNC"), New Jersey Democratic State Committee ("DSC"), Virginia L. Fegins and Lynette Monroe, Plaintiffs, have instituted an action in the United States District Court for the District of New Jersey, Civil Action No. 81-3876, against the Republican National Committee ("RNC"), New Jersey Republican State Committee ("RSC"), John A. Kelly, Ronald Kaufman and Alex Hurtado, Defendants; and

WHEREAS, the parties wish to resolve amicably all matters raised or which could have been raised in the pleadings in the above-entitled matter,

NOW THEREFORE, in consideration of the foregoing, in consideration of the mutual covenants and conditions herein contained, and for other good and valuable consideration, the parties hereto agree as follows:

1. The undersigned plaintiffs agree to consent to the entry of an order dismissing their Amended Complaint against all Defendants, without costs, with all parties bearing their own attorneys' fees.

2. The RNC and RSC (hereinafter collectively referred to as the "party committees") agree that they will in the future, in all states and territories of the United States:

(a) comply with all applicable state and federal laws protecting the rights of duly qualified citizens to vote for the candidate(s) of their choice;

(b) in the event that they produce or place any signs which are part of ballot security activities, cause said signs to disclose that they are authorized or sponsored by the party committees and any other committees participating with the party committees;

(c) refrain from giving any directions to or permitting their agents or employees to remove or deface any lawfully printed and placed campaign materials or signs;

(d) refrain from giving any directions to or permitting their employees to campaign within restricted polling areas or to interrogate prospective voters as to their qualifications to vote prior to their entry to a polling place;

(e) refrain from undertaking any ballot security activities in polling places or election districts where the racial or ethnic composition of such districts is a factor in the decision to conduct, or the actual conduct of, such activities there and where a purpose or significant effect of such activities

is to deter qualified voters from voting; and the conduct of such activities disproportionately in or directed toward districts that have a substantial proportion of racial or ethnic populations shall be considered relevant evidence of the existence of such a factor and purpose;

(f) refrain from attiring or equipping agents, employees or other persons or permitting their agents or employees to be attired or equipped in a manner which creates the appearance that the individuals are performing official or governmental functions, including, but not limited to, refraining from wearing public or private law enforcement or security guard uniforms, using armbands, or carrying or displaying guns or badges except as required by law or regulation, in connection with any ballot security activities; and

(g) refrain from having private personnel deputized as law enforcement personnel in connection with ballot security activities.

3. The party committees agree that they shall, as a first resort, use established statutory procedures for challenging unqualified voters.

4. This Settlement Agreement, and the terms of the Consent Order to be entered pursuant thereto, shall bind the DNC, DSC, RNC, and RSC, their agents, servants and employees, whether acting directly or indirectly through other party committees. It is expressly understood and agreed that the RNC and the RSC have no present right of control over other state party committees, county committees, or other national, state and local political organizations of the same party, and their agents, servants and employees.

5. The parties to this Settlement Agreement shall ask that the New Jersey legislature institute an examination of the provisions of the New Jersey Election Laws to determine whether present laws are adequate to insure the integrity of the electoral process and the physical security of poll workers and their property in New Jersey.

6. All parties agree that they shall bear their own costs and attorneys' fees and further agree that they shall not seek to recover same in any action or proceeding instituted after the execution of this Settlement Agreement and the Consent Decree to be entered pursuant thereto. No party to this Agreement shall undertake any further legal action arising out of events surrounding the November 1981 general election in the State of New Jersey or arising out of the filing of this lawsuit, except as specified in paragraph 7 below.

7. The undersigned Plaintiffs, as Releasees, for and in consideration of the mutual covenants and conditions hereof, and in further consideration of the sum of One Dollar (\$1.00), lawful money of the United States of America to the Releasees in hand paid by all Defendants, the receipt of which is hereby acknowledged, have remised, released and forever discharged, and by these presents do remise, release and forever discharge the Defendants-Releasees of and from all obligations, causes of action, claims or demands, at law or in equity, which arose out of ballot security activities during the 1981 general election in New Jersey that Releasees asserted or could have asserted against the Releasees in Civil Action No. 81-3876 in the United States District Court for the District of New Jersey, provided that nothing in this agreement shall prevent plaintiffs from seeking relief, at law or equity, for a violation of the terms of this settlement agreement or the related consent order incorporating the terms hereof. More particularly, but not by way of limitation, the undersigned plaintiffs expressly agree to abandon and to waive all claims to monetary relief asserted or which could have been asserted against the defendants.

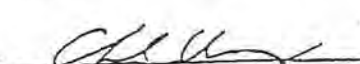
8. It is expressly understood and agreed that this Settlement Agreement, and the Consent Order incorporating the terms hereof, do not constitute any finding or admission of liability or wrongdoing by any defendant and do not constitute any finding or admission of merit or lack of merit to the allegations raised by the plaintiffs. This agreement is not an admission that any of the activities which the party committees have agreed not to undertake were undertaken by any of the party committees or by any party to this lawsuit or by any other person or entity. This agreement is not an admission of civil or criminal liability or responsibility on the part of any participant in it.

Dated November 1, 1982.

DEMOCRATIC NATIONAL COMMITTEE

REPUBLICAN NATIONAL COMMITTEE

By



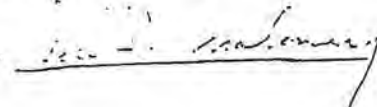
By



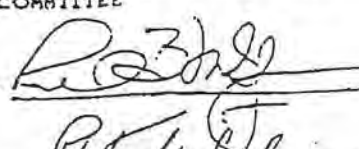
NEW JERSEY DEMOCRATIC STATE COMMITTEE

NEW JERSEY REPUBLICAN STATE COMMITTEE

By



By



Philip D. Kaltenbacher
Chairman, Republican
State Committee

SETTLEMENT AGREEMENT

WHEREAS, the Democratic National Committee ("DNC"), New Jersey Democratic State Committee ("DSC"), Virginia L. Feggins and Lynette Monroe, Plaintiffs, have instituted an action in the United States District Court for the District of New Jersey, Civil Action No. 81-3876, against the Republican National Committee ("RNC"), New Jersey Republican State Committee ("RSC"), John A. Kelly, Ronald Kaufman and Alex Hurtado, Defendants; and

WHEREAS, the parties wish to resolve amicably all matters raised or which could have been raised in the pleadings in the above-entitled matter,

NOW THEREFORE, in consideration of the foregoing, in consideration of the mutual covenants and conditions herein contained, and for other good and valuable consideration, the parties hereto agree as follows:

1. The undersigned plaintiffs agree to consent to the entry of an order dismissing their Amended Complaint against all Defendants, without costs, with all parties bearing their own attorneys' fees.

2. The RNC and RSC (hereinafter collectively referred to as the "party committees") agree that they will in the future, in all states and territories of the United States:

(a) comply with all applicable state and federal laws protecting the rights of duly qualified citizens to vote for the candidate(s) of their choice;

(b) in the event that they produce or place any signs which are part of ballot security activities, cause said signs to disclose that they are authorized or sponsored by the party committees and any other committees participating with the party committees;

(c) refrain from giving any directions to or permitting their agents or employees to remove or deface any lawfully printed and placed campaign materials or signs;

(d) refrain from giving any directions to or, permitting their employees to campaign within restricted polling areas or to interrogate prospective voters as to their qualifications to vote prior to their entry to a polling place;

(e) refrain from undertaking any ballot security activities in polling places or election districts where the racial or ethnic composition of such districts is a factor in the decision to conduct, or the actual conduct of, such activities there and where a purpose or significant effect of such activities

is to deter qualified voters from voting; and the conduct of such activities disproportionately in or directed toward districts that have a substantial proportion of racial or ethnic populations shall be considered relevant evidence of the existence of such a factor and purpose;

(f) refrain from attiring or equipping agents, employees or other persons or permitting their agents or employees to be attired or equipped in a manner which creates the appearance that the individuals are performing official or governmental functions, including, but not limited to, refraining from wearing public or private law enforcement or security guard uniforms, using armbands, or carrying or displaying guns or badges except as required by law or regulation, in connection with any ballot security activities; and

(g) refrain from having private personnel deputized as law enforcement personnel in connection with ballot security activities.

3. The party committees agree that they shall, as a first resort, use established statutory procedures for challenging unqualified voters.

4. This Settlement Agreement, and the terms of the Consent Order to be entered pursuant thereto, shall bind the DNC, DSC, RNC, and RSC, their agents, servants and employees, whether acting directly or indirectly through other party committees. It is expressly understood and agreed that the RNC and the RSC have no present right of control over other state party committees, county committees, or other national, state and local political organizations of the same party, and their agents, servants and employees.

5. The parties to this Settlement Agreement shall ask that the New Jersey legislature institute an examination of the provisions of the New Jersey Election Laws to determine whether present laws are adequate to insure the integrity of the electoral process and the physical security of poll workers and their property in New Jersey.

6. All parties agree that they shall bear their own costs and attorneys' fees and further agree that they shall not seek to recover same in any action or proceeding instituted after the execution of this Settlement Agreement and the Consent Decree to be entered pursuant thereto. No party to this Agreement shall undertake any further legal action arising out of events surrounding the November 1981 general election in the State of New Jersey or arising out of the filing of this lawsuit, except as specified in paragraph 7 below.

7. The undersigned Plaintiffs, as Releasors, for and in consideration of the mutual covenants and conditions hereof, and in further consideration of the sum of One Dollar (\$1.00), lawful money of the United States of America to the Releasors in hand paid by all Defendants, the receipt of which is hereby acknowledged, have remised, released and forever discharged, and by these presents do remise, release and forever discharge the Defendants-Releasees of and from all obligations, causes of action, claims or demands, at law or in equity, which arose out of ballot security activities during the 1981 general election in New Jersey that Releasors asserted or could have asserted against the Releasees in Civil Action No. 81-3876 in the United States District Court for the District of New Jersey, provided that nothing in this agreement shall prevent plaintiffs from seeking relief, at law or equity, for a violation of the terms of this settlement agreement or the related consent order incorporating the terms hereof. More particularly, but not by way of limitation, the undersigned plaintiffs expressly agree to abandon and to waive all claims to monetary relief asserted or which could have been asserted against the defendants.

8. It is expressly understood and agreed that this Settlement Agreement, and the Consent Order incorporating the terms hereof, do not constitute any finding or admission of liability or wrongdoing by any defendant and do not constitute any finding or admission of merit or lack of merit to the allegations raised by the plaintiffs. This agreement is not an admission that any of the activities which the party committees have agreed not to undertake were undertaken by any of the party committees or by any party to this lawsuit or by any other person or entity. This agreement is not an admission of civil or criminal liability or responsibility on the part of any participant in it.

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Dated November 1, 1982.

DEMOCRATIC NATIONAL COMMITTEE

REPUBLICAN NATIONAL COMMITTEE

By [Signature]

By [Signature]

By [Signature]

NEW JERSEY DEMOCRATIC STATE
COMMITTEE

NEW JERSEY REPUBLICAN STATE
COMMITTEE

By [Signature]

By [Signature]

[Signature]
Philip D. Kaltenbacher
Chairman, Republican
State Committee

Exhibit 18

Ohio Poll Watcher Training

- This presentation is a general overview of Ohio election law.
- It is extremely important to know the law this election season.
- With all of the current and potential legal challenges, everyone must follow Ohio law to the letter.

Agenda

- Basic Election Day Information
- Poll Watchers
- Voter Identification
- Absentee Ballots
- Provisional Voting
- Challenging Procedures
- Process for Resolving the Challenge
- Counting Ballots

Polling Place Information

- Hours: 6:30 a.m. until 7:30 p.m.
- Persons in line when polls close must be allowed to vote.
- If there is an official order extending normal polling hours, voters who arrive after the official closing time may only cast a provisional ballot

Prohibited Activity

- No campaigning or political activity of any kind may occur within 100 feet of any polling place. This threshold should be clearly marked with U.S. flags.

Who May Enter the Polling Place

- No person, except election officials, employee, witnesses, challengers, or police officers, shall be allowed to enter the polling place during the election, except for the purpose of voting. No more electors shall be allowed to approach the voting shelves at any time than there are voting shelves provided. The judges of election and the police officer shall strictly enforce the observance of this section.

Disabled Voters

- If the polling place is not accessible to a handicapped person, that person may cast their vote, in the vehicle in which they arrived at the polling place or at the door of the polling place, with the assistance of two polling place officials.

Voter Rights

- must be provided with a voting machine that is in working condition,
- must be provided with another ballot if you made a mistake,
- may request up to three ballots due to mistakes you made,
- can ask for written or verbal instructions,
- can receive help in voting if you ask for it,

Voter Rights (Cont'd)

- can bring an aide or interpreter if you are disabled or have a language barrier,
- cannot be prevented from voting for any reason if you are a registered voter,
- can vote if you are in line at the correct polling location at the time the polls close,
- must be given an explanation and offered a resolution if you are not allowed to vote.

According to <http://www.sos.state.oh.us/sos/elections/>

Voter Verification

- The voter states his name and address to polling officials.
- He then writes his name and address in the poll signatures book.
- That signature is compared with the signature on the registration form or digitized signature list. No other ID is required.

Receiving a Ballot

- A voter may receive replacement ballots from election officials prior to his vote being cast.
- The voter may not receive more than three ballots.
- A voter who is flagged as voting absentee should not be allowed to vote on Election Day. If the voter presses the issue, a provisional ballot may be cast.

Challengers

- A political party may appoint one person who is a qualified elector, to serve as a challenger for the party during the casting of the ballots, and the actions of the judges from the opening to the closing of the polls.
- Any person attempting to vote may be challenged by any challenger, any elector lawfully in the polling place or by any judge or clerk of the elections.

How do I become a Challenger?

- As a challenger or witness, you must file a certificate of appointment at the precinct with the presiding judge either:
 - At the meeting on the evening prior to the election;
 - Or On the day of the election

More on Becoming a Challenger

- After the certificate of appointment is filed with the presiding judge, you are permitted by law to:
- Be present inside the polling place during the casting of the ballots.
- Observe every proceeding of the judges and clerks of elections from the time of the opening until the closing of the polls.

Challenge Process

- The presiding judge administers an oath to the challenged person. The oath is based on the reason the person is challenged as unqualified to vote. (i.e.: not 18, not registered)
- Judges can ask further questions to test person's qualifications as an elector at the election.
- If the person refused to answer any question, cannot answer any question fully, refuses to sign name or mark, or if for any other reason the judges believe the person is not eligible to vote, the judges may refuse the person a ballot.

Challenge Continued

- If the person is disqualified because they have arrived at the wrong precinct, the voter shall be instructed to contact the appropriate board of elections for the voting precinct.

Making a Challenge

- Make certain that your challenges are not based on race or sex.
- When challenging a voter's qualifications, specify the nature of your challenge by declaring that:
 - The voter is not a citizen.
 - The voter has not resided in Ohio for thirty days prior to the election.
 - The voter is not a resident of the county or precinct where they are attempting to vote.
 - The person is not of the legal voting age of eighteen years old.

Making a Challenge Cont'd

- Challenge any person that you believe is impersonating an elector. The precinct officials must question that person and require him or her to sign their name on a card.
- If the majority of the precinct officers are of the opinion that the person is impersonating an elector, that person must be denied the right to vote.

Making a Challenge Cont'd 2

- A challenger may not debate or appeal the presiding judge's determinations regarding an elector's qualifications to vote. The judge's determinations regarding a voter's qualifications are final.

Witnesses

- Witnesses may watch the counting of the ballots in the precinct from the time of the closing of the polls until the counting is completed and final returns are certified and signed. (Challengers are not permitted to watch counting.)

Provisional Ballots

- Pursuant to HAVA Section 302, if a person declares he or she is a registered voter and the voter's name is not on the official list of eligible voters, the person may vote a provisional ballot. Pursuant to Ohio law, any voter who does not appear on the registered voter list because he/she has moved or changed names should vote provisionally.

Provisional Ballots Cont'd

- A first time voter who registered by mail and is required to show proper identification before voting, but is unable to do so, may vote a provisional ballot. If a person shows proper identification (either a current and valid photo id or a utility bill, bank statement, government check, paycheck or other government document showing name and address) they should be permitted to vote a regular ballot. However, if they cannot show identification or if any questions regarding the sufficiency of the identification are raised, then the voter must vote provisionally.

Provisional Ballots Cont'd

- According to the SOS, the pollworker must confirm that the voting residence claimed by the voter is located within the area on the precinct map and listed on the street listing.
- Only after the precinct pollworkers have confirmed that the person is eligible to vote in that precinct may the pollworkers issue a provisional ballot to that person. Under no circumstances shall precinct pollworkers issue a provisional ballot to someone whose address is not located in the precinct (or portion of) in which the person desires to vote.

Closing of Polls

- Admission to the polling place after closing of the polls is exclusively limited to:
 - The judges and clerks of the election.
 - The registered witness (remember that if you serve as both, a challenger and a witness, you are permitted to remain in the polling place after closing of the polls).
 - A police officer.
 - Other persons who are detailed to any precinct on request of the board of elections.
- The secretary of state or his legal representative.

Counting Ballots – Disputed Ballots

- If there is any disagreement as to how a ballot should be counted the members of the board must decide on whether or to what extent the ballot should be counted. If three of the members do not agree as to how any part of the ballot shall be counted, only that part of such ballot on which three of the members do agree shall be counted. A notation shall be made upon the ballot indicating what part has not been counted, and the ballot shall be placed in an envelope marked "Disputed Ballots."

Counting Ballots - Judges

- From the time the ballot box is opened and the count of ballots begun until the ballots are counted and certificates of votes cast are made out, signed, certified and given to the presiding judge for delivery to the headquarters of the board of elections, the judges in each precinct shall not separate, nor shall a judge leave the polling place except from unavoidable necessity. In cases of illness or unavoidable necessity the board may substitute another qualified person for any precinct official so incapacitated.

Counting Absentee Ballots -Where

Board of elections shall determine whether absent voter's ballots shall be counted in each precinct, at the office of the board, or some other location designated by the board.

- When ballots are counted in precincts, director of election boards shall deliver to the presiding judge of each precinct on Election Day, identification envelopes purporting to contain ballots of absentee electors from the precinct.
- When the board determines that the absentee ballots will be counted in the office, special election judges are appointed.

Counting Absentee Ballots

- Judge shall announce name of the elector who appears to have signed the statement of voter on the outside of envelope and signatures on registration form and outside of envelope are compared.
- If no challenge is made (or made & not sustained), the presiding judge shall open the envelope without defacing the statement of the voter and without mutilating the ballots, and shall remove the ballots contained and count them.

Counting Absentees- Not Counted

- If election officials find that the statement accompanying an absent voter's ballot is insufficient, that the signatures do not correspond, that the applicant is not qualified in the precinct, or that the ballot envelope contains more than one ballot or any ballot the voter is not entitled to vote, or that the stub is detached, the vote shall not be accepted or counted. Every ballot not counted shall be indorsed on its back "Not Counted" with the reasons, enclosed and returned to or retained by the board of elections along with contested ballots.

GUIDANCE FOR OHIO POLLWATCHERS

- 1) **If a voter's name is not on the voter roll voter must cast a provisional ballot. Voter must cast ballot in proper precinct for provisional ballot to be counted.**
- 2) **Voter signs poll book, signature compared to registration form or digitized signature file. If majority of precinct officials agree signatures made by same person, person votes regular ballot; if not, voter may be denied a ballot.**
- 3) **If a voter appears at the polling place after requesting an absentee ballot, he will be directed to the Board of Elections where he must either surrender the absentee ballot or swear out an affirmation that he did not receive the absentee ballot. The voter will then vote a regular ballot.**
- 4) **If voter's name is flagged on the voter roll for ID, voter must show ID under HAVA, if he does not have ID, he must cast a provisional ballot**

Reasons to challenge:

Voter is not a resident of the precinct or the county where they are attempting to vote.

Voter is not 18 years of age

Voter is not a US citizen

Voter has not resided in Ohio for thirty days prior to the election.

Note: Presiding judge puts challenged voter under oath, judge may refuse the voter a ballot if he believes the voter is not eligible to vote.

OHIO

VOTER ENTERS
POLLING PLACE

First Time Voter Who
Registered by Mail?

States Name & Address to
Polling Place Official

Has Voter Previously
Shown ID?

If voter is not on list
because recently
moved, or changed
names, voter should
cast provisional
ballot.

Writes Name and Address in
Poll Signatures Book

YES

NO

Voter Shows
Required ID

Challenge, if
appropriate, should be
made at this time

Signature Compared to
Registration Form or
Digitized Signature File

Voter does not
have required ID

If majority of
precinct officers
agree that person
is not eligible to
vote, may be
denied ballot

If majority of precinct officials agree
that signatures are
made by same person,
the voter casts a regular ballot

Voter should not be given
regular ballot, instead
should be allowed to cast
provisional ballot*

Voter disqualified because
in wrong polling place shall
be instructed as to how to
ascertain the location of
appropriate polling place

Voter's provisional ballot
should not be counted unless
voter returns at some point with
required ID*

**Has not been clarified by
state law*



Republican
National
Committee

Counsel's Office

September 2004

MEMORANDUM TO REPUBLICAN NATIONAL COMMITTEE MEMBERS,
STATE PARTY CHAIRMEN, EXECUTIVE DIRECTORS,
VICTORY EXECUTIVE DIRECTORS, BUSH-CHENEY '04
EXECUTIVE DIRECTORS AND COUNSELS

FROM: MIKE DUNCAN, GENERAL COUNSEL
JILL HOLTZMAN VOGEL, CHIEF COUNSEL
CAROLINE HUNTER, DEPUTY COUNSEL

RE: ELECTION DAY ACTIVITIES

As Election Days approaches, we hope the enclosed *Poll Watcher 2004* manual will help you to put any needed finishing touches on your poll watcher program. The manual is geared primarily toward political operatives at the county / local level and consists of two sections:

- 1) Suggestions for designing and implementing a poll watcher program
- 2) Suggested materials for poll watchers

We suggest you add a third section to the manual – specific instructions for poll watchers based on your relevant state laws.

As you know, the purpose of the poll watcher program is to ensure that every eligible voter has the right to vote. Guaranteeing an honest, fair vote is a crucial component of American elections.

The Republican National Committee does not engage in any ballot security or Election Day program designed to prevent any eligible registered voter from voting. The party

will not promulgate, nor will it sanction or condone, any attempt to prevent an eligible voter from voting. Further, the Republican National Committee operates consistent with the terms of the consent order entered by the United States District Court for the District of New Jersey as a result of programs conducted in New Jersey and Louisiana in 1981 and 1986, respectively.

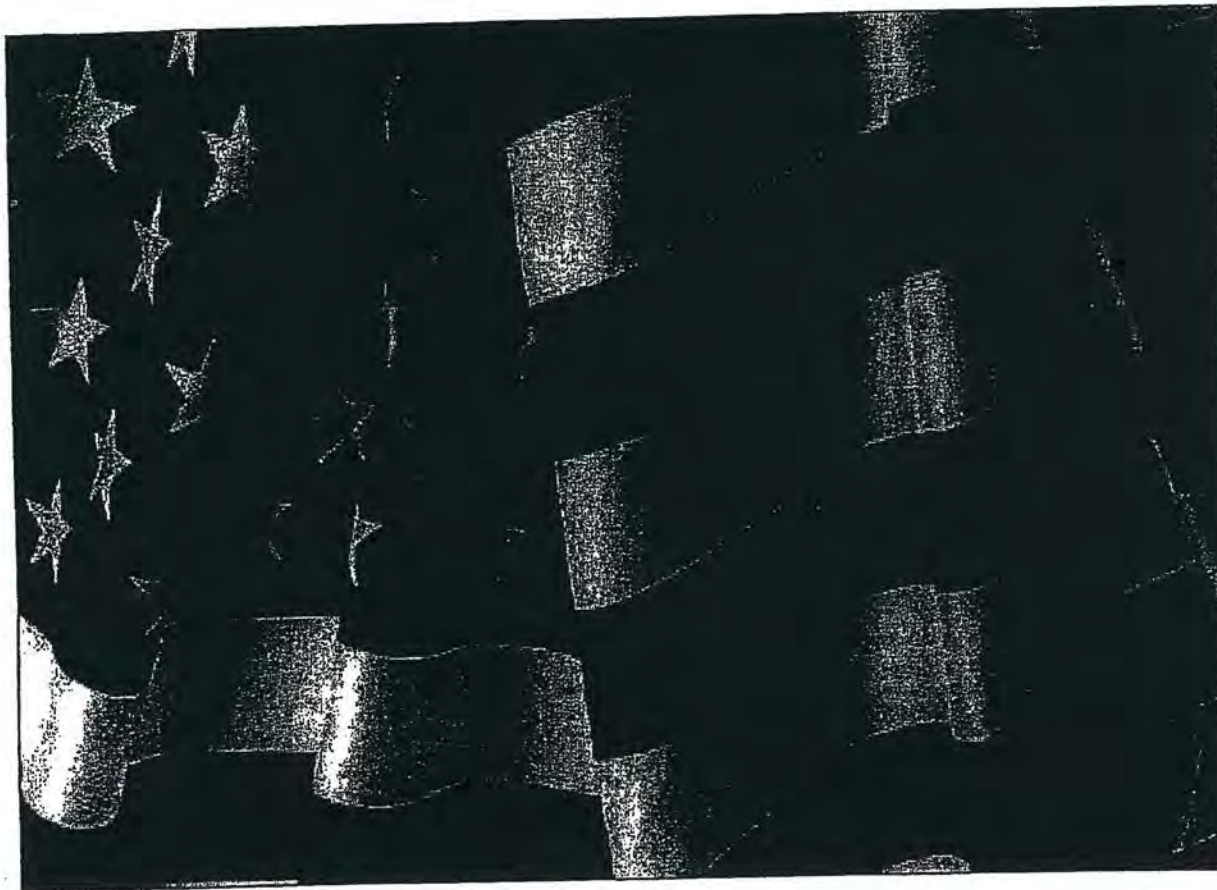
The consent order requires that the Republican National Committee "refrain from undertaking any ballot security activities in polling places or election districts where the racial or ethnic composition of such districts is a factor in the decision to conduct such activities there and where a purpose or significant effect of such activities is to deter qualified voters from voting." Further, the consent order states that "the conduct of such activities disproportionately in or directed toward districts that have a substantial proportion of racial or ethnic populations shall be considered relevant evidence of the existence of such a factor and purpose."

The consent order specifically permits the Republican National Committee to assist and participate in "normal poll watch functions" such as distribution of the enclosed *Poll Watcher 2004* manual and all Election Day operations and activities permitted by state law.

Should you or the campaigns in your state encounter any problems or irregularities on Election Day, we will be able to assist you. You can contact the RNC Election Day Hotline at 1-866-758-8938. Our fax number is 202-863-8654.

I urge you to be vigilant in any programs you conduct in order to ensure a fair and honest vote on November 2nd.

If you have any questions, please do not hesitate to call the Counsel's Office at (202) 863-8638.



POLL WATCHER 2004

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310 First Street, SE • Washington, DC 20003 • (202)863-8500 • FAX: (202)863-8820
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POLL WATCHER 2004

Poll Watcher 2004 is a necessary part of political planning to ensure the sanctity of the privilege of voting.

Poll Watcher 2004 has four broad objectives:

1. To guarantee a fair and complete vote count.
2. To ensure that no voters are unjustly denied their right to vote.
3. To prevent unlawful election practices, errors and omissions either intentional or not.
4. To get the public interested in the proper function of the electoral process.

The chairman at each level of the party structure is responsible for recognizing the importance of and initiating a poll watcher program. The chairman, however, should appoint a poll watcher chairman to oversee the day-to-day operation of this phase of the campaign.

The following guide includes some suggestions for designing and implementing a poll watcher program intended to ensure an honest, complete and fair vote.

ORGANIZING THE POLL WATCHER 2004 PROGRAM

Key Personnel and their Responsibilities

The following outline of personnel responsibilities will help you develop a written plan and timeline for a poll watcher effort. State laws, which will vary greatly, must be considered when developing specific plans.

State laws, for example, will address:

1. Poll watcher qualifications.
 - Many states require poll watchers to be registered to vote in the county or precinct to which they assigned to work on Election Day.
2. Credentialing of poll watchers.
 - Many states require the state and/or county party to submit a list of poll watchers to the appropriate elections officials in advance of Election Day.
3. The circumstances under which a voter's qualifications can be challenged.

STATE AND/OR LOCAL PARTY CHAIRMAN

1. Appoint a poll watcher chairman/organizer.
2. Meet with poll watcher staff to plan program and personnel activities.
3. Prioritize precincts.

Duties of 2004 Pollwatcher Chairman

Appoint and oversee personnel responsible for:

- a. Recruitment of volunteers
- b. Legal and research
- c. Operations and training
- d. Communications

RECRUITMENT DIRECTOR

Individuals responsible for recruiting volunteers at the local level should coordinate their efforts with those of the state party and statewide campaigns to ensure maximize coverage of precincts on Election Day.

Determine the number of poll watchers required for an effective effort

1. Work with the legal team to research relevant state law regarding the maximum number of poll watchers and challengers allowed per precinct and the legal requirements relating to the absentee ballot and provisional ballot (if applicable) count.
2. Check with state election commission or local election authorities for changes in name and number of precincts from the previous election.
3. Formula for determining the number of precinct workers needed: Multiply number of allowable precinct workers by number of precincts to be covered; then add the number needed for the absentee and provisional (if applicable) ballot counts to get a minimum figure (if absentee ballots at counted at a central location not at the individual precincts). Add 10% - 15% to compensate for those who will not appear for duty or who cannot work for the entire day.

Find volunteers

1. Obtain lists of previous poll watchers and challengers. Call them.
2. Contact ward/precinct chairmen (or the local poll watcher chairman) for recommendations concerning potential volunteers.

Identify additional sources of workers:

- a) Lists of registered voters; party auxiliaries;
- b) Team Leaders; volunteers from local campaigns;
- c) Local Chamber of Commerce and other business groups, veterans' organizations;
- d) Retired individuals;
- e) Police (off duty) (check with police headquarters to determine if permitted);
- f) Church or civic groups

3. The Hatch Act - Civilian employees in the executive branch of the federal government and employees of the U.S. Postal Service are subject to the Hatch Act; however, nearly all of these employees are permitted to take an active part in partisan political management and campaigns. A federal employee, who is off-duty, may work at the polls on Election Day for the city or county as an election judge, poll watcher or clerical worker or for a candidate or political party by observing the check-in process, holding a sign or distributing campaign literature. A federal employee may not use a government vehicle, wear an official uniform, be in a government office, or be on-duty while

performing poll watcher duties. If you have any questions or concerns, please see <http://www.osc.gov/hatchact.htm> or contact the RNC Counsel's Office at (202) 863-8638.

Coordination

1. Prepare a computerized list of potential volunteer names, contact information, home precinct and hours available to work.
2. Contact each potential volunteer poll watcher and confirm availability and willingness to work.

Make assignments

1. Assignments should be made at the time of recruitment or shortly thereafter. First time volunteers may prefer to be assigned to their home precinct. More experienced volunteers should be considered for the top priority precincts.
2. Determine shifts and replacements (if allowed by state law).

LEGAL AND RESEARCH DIRECTOR

Prior to undertaking the research and materials preparation suggested below, local teams should contact the state party's counsel to determine what research has already been compiled and materials prepared.

Before the Election

1. Review federal, state and local laws, including sections on absentee ballots and provisional ballots (if applicable) and voting fraud and irregularities.
2. Recruit the assistance of as many Party lawyers as possible to, among other tasks listed below, staff the phones at the operations center on Election Day; make up the mobile legal trouble-shooting teams; monitor the absentee ballot and provisional ballot (if applicable) counts.
3. Assure, where applicable, that Party members are named as election officials in every precinct.
4. Work with the Operations and Training Director to determine when and where the local elections officials will be holding their training session(s) for their official Election Day precinct workers. Have at least one person from the legal team and one from the operations and training team attend the session(s).
5. Research past election litigation including efforts to extend polling place hours; challenges to poll watchers' credentials; ability to require voter identification, etc.
6. Use knowledge of past vote irregularities to select priority precincts, and make that knowledge available to all involved in the poll watcher effort. This information can come from local news media sources, court records and law enforcement officials.
7. Monitor absentee ballot and provisional ballot (if applicable) procedures and counts.
8. Work with Operations and Training Director to ensure proper credentials are prepared for Election Day poll watchers.
9. Know contact information for federal, state and local law enforcement officers and judges.
10. Research federal and state remedies for election violations.
11. Develop lists for the poll watchers of potential polling place procedural problems/irregularities as well as machine related problems for which they should be on the alert (See Section 2 for suggested lists)
12. Know pre-election rights and remedies to eliminate the need to seek remedies after the

election.

On Election Day

1. Supervise mobile dispatch of legal troubleshooting teams.
2. Have volunteers monitor relevant county clerks' offices for filings.
3. Have a lawyer or legal representative at the county courthouse with the required forms if prompt action becomes necessary.

After the Election

1. Ensure proper dispositions of all allegations
2. Remain aware of all serious allegations of election fraud, and follow up substantive legal challenges.

OPERATIONS AND TRAINING DIRECTOR

Individuals tasked with overseeing the operations and training component of the poll watcher program should check with their state party to determine if the state party is holding training sessions and/or preparing training materials.

Before the Election

1. Establish the poll watcher "operations center" at a location with multiple phone lines through which all questions of propriety and procedure will pass on Election Day.

2. Prepare poll watcher kits for all necessary on-site staff containing (See Section 2 for suggested materials):

- Poll watcher identification and credentials, signed by authorized individual
- Election Poll Watcher instruction sheet
- Copy of list of potential Election Day procedural irregularities, problems or errors
- List of registered voters
- Complaint Intake Forms
- Witness Statement Forms
- List of key telephone numbers
- Election Day schedule

3. Train Party poll watchers and challengers. Include in the training:

- Election laws and any additional information from the official election worker training session(s) about expected election procedures at the precinct level.
- Description of the types of errors and irregularities that may occur and what actions to take.
- Voting procedures including the types of voting machines being used.
- Procedures for recording and reporting incidents. (See Section 2 for suggested Witness Statement Forms and Complaint Intake Forms.)
- Conduct of poll watchers.

- Shift and equipment requirements.
- 4. Distribute the poll watcher kits at training sessions. All materials should :
 - Emphasize emphatically and prominently the objective of the Poll Watcher Program is to work to ensure that no voter is unjustly denied their right to vote.
 - State very clearly what actions the volunteer poll watchers can and cannot take
 - Encourage the volunteer poll watchers, as representatives of the Party, to be a helpful, positive influence in the conduct of the election at their assigned precinct.
- 5. Monitor voting machine security including dispatching teams to observe the inspection and certification of voting machines by local elections officials prior to Election Day (if allowed by state/local law).

Election Day

1. Supervise poll watcher operations center and all people connected with the poll watcher effort
2. Keep records of all alleged voting incidents and irregularities. (See Section 2 for a suggested intake form for complaints).
3. If watchers are not permitted by law to leave the polling area during Election Day, meals and light refreshments for them should be considered.

After the Election

1. Make sure all ballot boxes and/or machines are properly secure when the polls officially close and, if necessary, impounded.
2. Have Party poll watcher officials present at the counting of absentee ballots and provisional ballots (if applicable).
3. Distribute blank incident report forms to poll watching staff. (See attached sample.) Gather/prepare reports on election-related incidents.

COMMUNICATIONS DIRECTOR

Rather than appointing a individual to handle communications solely for this effort, many state and local party chairmen will opt to use their existing communications personnel for this function.

Before the Election

1. Originate contact with local news media; develop lists of media organizations; develop specific editorial contacts and make those people aware of the issue of ballot fraud.
2. Prepare op-ed articles and assist media in publicizing past instances of voting irregularities.
3. Develop publicity outlining the extent of the Party poll watcher program.
4. Distribute material promoting honest elections; develop materials locally if possible.
5. Identify local attorneys and other legal experts who are also capable of speaking to the press on the issues of voting irregularities and ballot fraud.

Election Day

1. At the poll watchers operations center, gather information on specific polling incidents or possible election law infractions. Those judged by the party chairman, poll watcher chairman and other involved party officials to be most noteworthy on the basis of timeliness, completeness of fact and severity should be brought to the attention of the media quickly.

CONCLUSION

The Program outlined in this booklet has one purpose, i.e., to ensure that only qualified voters cast their ballots in an election. It is of the greatest importance that attorneys and others involved in the Poll Watcher 2004 program be certain that their actions in pursuing this important goal are never misconstrued as attempts to prevent qualified voters from voting. The Party rejects any methods or tactics which in any way could be viewed as chilling an individual's intent to exercise his or her right to vote.

The Party will not promulgate, nor will it sanction or condone ANY attempt to prevent an eligible registered voter from voting.



SUGGESTED MATERIALS FOR POLL WATCHERS

CERTIFIED MACHINE SERIAL, SEAL, AND VOTE COUNTER NUMBERS

(1) STATE / COUNTY: _____

(2) INSPECTION DATE / TIME: _____
Month/Day/Year Time

(3) WAREHOUSE
LOCATION: _____

(4) NAMES OF ELECTION OFFICIALS PRESENT:

| | |
|-------|-------|
| _____ | _____ |
| _____ | _____ |
| _____ | _____ |
| _____ | _____ |

(5) OTHER CAMPAIGNS AND/OR GROUPS PRESENT:

(6) POLL WORKER CHECKLIST

· Did the Election Officials explain the procedures behind their actions (e.g., explain how they verify that the machines have not been tampered with)?

· Did all Election Officials agree that the machines that were present were the machines that were the proper machines?

· Did at least two Election Officials identify each machine, and verify that it was the proper machine, and that it was secure?

· Did you obtain a written form/verification from the Election Officials that the machines were in proper order?

- Did each machine's vote counting mechanism show a "zero count" (no pre-Election Day votes)?
- Did the machines appear to be well kept, and in working condition?
- Was the storage warehouse in which the machines were kept secure?

(7) NOTES

Please record any irregularity that you detected, if any, during the process of certifying the machine serial numbers and pre-Election Day vote count. Please also note any item that you believe to be relevant in the space provided below.

NOTES

(If you run out of space, continue on the back of this sheet)

POLL WATCHER APPLICATION

NAME: _____

ADDRESS: _____

CITY, STATE, ZIP: _____

PHONE: _____ (HOME) _____ (OFFICE)

Yes, I would like to be an official poll watcher appointed and authorized by the _____ to ensure a fair, honest and complete vote for all candidates in the _____ election to be held on _____. I am a qualified voter in the County of _____ and attest I meet all the qualifications to be a poll watcher as set forth in state law.

(SIGNATURE OF APPLICANT)

My home precinct is: _____

My name as it appears on my voter registration card is:

I am available to work at the polls on Election Day from _____ to _____.
(Note: Polls will be open from _____ to _____.)

I have served as a poll watcher before YES _____ NO _____

I will accept an assignment outside my home precinct YES _____ NO _____

I speak a language (other than English) fluently YES _____ NO _____

If so, what language _____

ELECTION DAY INSTRUCTIONS FOR POLL WATCHERS

NAME: _____

You have been assigned to Precinct: _____

The address for the polling place is: _____

You have been assigned to work from _____ to _____

The polls will be open from _____ to _____.

If you have been assigned to be at the polling place when it opens in the morning:

- Arrive at least 30 minutes before the polling place is scheduled to open.
- Confirm that the machines which are in the polling place are the same ones certified by Elections Officials during the pre-election inspection (see attached list).
- Record the names of the Elections Officials assigned to the precinct

If you have been assigned to be at the polling place when it closes in the evening:

- Confirm that all voters standing in line at the official closing time are allowed to cast their vote.
- If there is an official order extending normal polling hours, voters who arrive after the official closing time may only cast a provisional ballot.
- Remain in the polling place until the vote tally is complete and the ballots are secured and picked up for transport to the Election Board.

The Elections Officials working in this polling place are:

The Party poll watchers assigned to this precinct are:

POTENTIAL VOTING MACHINE PROBLEMS

I. Paper Ballot Voting Systems

"Paper ballot systems" include: (1) punchcard ballot systems; (2) optical scan ballot systems; and (3) "old fashioned" hand-written paper ballots. Paper voting systems share many of the same or similar potential problems. Following is a list of many of these problems. Where unique problems arise in connection with a particular system, it is clearly indicated below.

A. Paper Ballot Voting System Common Issues

Poll Watchers should make sure that:

While the polls are open

- The official ballot box, which includes a lock and secure opening mechanism, is used, and not switched with an "unofficial" ballot box.
- The ballot box is empty prior to the polls opening, and is not stuffed with votes.
- The number of ballots received by the polling place is verified prior to opening the polling place.
- No ballots other than the official ballots received by the polling place are utilized on Election Day.
- No ballots are erased and revoted during the voting period.
- Voters seeking help with how to properly use the voting system are not being guided by the poll workers in any manner as to their voting selection.
- No unauthorized person is allowed to handle the ballots at any point - including prior to and during the voting period, during the counting period, or anytime following the counting period.
- The ballot box remains sealed until after the polling station is closed and the counting process is to begin.
- No ballots are erased, excluded, or destroyed during the counting process.
- The counting process is orderly, and that no ballots, or stacks of ballots, are shifted, re-counted, or excluded from the count.
- The ballots are handled carefully during the count, and that no ballots are smudged, ripped, or marked during the count.
- Ballots are properly secured following the counting period.

- Ballots are transported from the polling center properly, and by only authorized personnel.

1. Optical Scan Specific Issues:

(a) Poll workers have agreed that the ballot counting mechanism is properly set to a "zero-count" prior to the poll station being opened.

(b) An optical scan machine will reject a ballot if the machine detects (1) an overvote; (2) an undervote; and/or (3) a miscellaneous marking error. Typically, a poll worker will be present when the voter enters his or her ballot into the scan machine. Thus, where the ballot is rejected, poll watchers should be alert.

i. Make certain that the poll worker clearly explains why the ballot was rejected, and that the voter may choose to either (i) cast that same ballot, (ii) correct that ballot, or (iii) vote a new ballot.

ii. Make certain that if the voter chooses to vote a new ballot, the rejected ballot is not included with the cast ballots.

iii. Make certain that the poll worker does not offer any guidance to a voter concerning the voter's voting selection.

iv. Make certain that the poll worker is reading the reason for the ballot's rejection off of the optical scan machine, and not reviewing the actual voted ballot.

2. Punchcard Specific Issues

- Make certain that ballot boxes are handled carefully by poll workers during the voting period, and that the boxes are not shaken, or dropped, or otherwise handled in a manner that might affect the chads on the ballots.
- Make certain that poll workers properly validate ballots.

B. Electronic Voting System Issues

Poll watchers should make certain that:

1) Poll workers agree that the machines have been properly tested prior to the opening of the polling station.

2) Poll workers agree that the machine has registered a "zero-count" prior to opening the polling place.

3) Machines are properly connected to a power supply at all times during the voting period.

4) If a problem arises, a new machine is not substituted for the malfunctioning machine - and that the malfunctioning machine remains at the polling station *and is not tampered with in any fashion until authorized personnel arrive.*

- 5) Poll workers agree that the machines are properly set to "election" mode and that none remain in "testing" or "demonstration" mode.
- 6) Poll workers responsible for activating the machine do not influence or direct voters as to their political selection.
- 7) Proper instructions are provided to individuals who inquire concerning how to cast a vote on an electronic machine.
- 8) Any problems associated with the machines are addressed quickly and appropriately by the poll workers (e.g., placing an immediate call to a vendor hotline).
- 9) The final tally printed by each machine after the polls are closed is properly handled by only authorized personnel.
- 10) (For machines requiring an activation card) Only authorized personnel are allowed access to the card programming machine, and that all activation cards are collected by the poll workers from each voter following his or her voting.

C. Mechanical Lever Machine Issues

Poll watchers should make certain that:

- 1) Polls are opened with the machines registering a zero count, and the machines properly locked to prevent any access to the counting mechanisms during the voting period.
- 2) The meter number is not covered from view at any point before the polls open, during the election process, or after the polls close and the counting process begins.
- 3) The candidates' names are in the proper order, and that none are misspelled, upside down, or otherwise obscured in any way.
- 4) The curtains on the machines close properly.
- 5) The poll workers do not enter the polling booth with a voter (or, in cases where a voter needs assistance, that poll workers do not enter the booth and close the curtain).
- 6) That the labeling and handles on the machine are clear and correct, and the proper color.
- 7) If a machine malfunctions, no one opens the machine unless and until authorized technicians arrive (or, where such technicians are unavailable, that no single person open a machine - a poll worker from each party should be present during any moment that a machine is open for repair).

POLLWATCHER OBSERVATION FORM

November 2, 2004

Thank you for serving as a poll watcher. The active participation of all parties and of all citizens in the election process is essential to assure the fairness and integrity of the election.

The goal of this effort is: 1) to protect the right of any individual who is entitled to vote to cast a ballot no matter the voter's partisan affiliation 2) to protect and to assure that the integrity of the election process is preserved and that lawfully cast votes are not debased or denied by illegally cast ballots or by error of election authorities.

Your Name _____ Your Phone Numbers _____

County _____ Ward/Precinct _____

Polling Place _____ Hours served in polling place _____

OBSERVATIONS TO BE MADE

1. How many election judges were present in the polling place?.....
2. Were there any unauthorized persons in the polling place?..... Yes No
If yes, describe _____
3. A) Were there long lines at the polls? _____
B) How long was the wait to cast a ballot? _____
C) How many voting booths were there? _____
D) Did the voting equipment appear to be in good working order? Yes No
E) Were there adequate supplies (blank ballots, etc) Yes No
4. Was the polling place facility handicapped accessible? Yes No
5. Were election instruction posters displayed? Yes No
6. Is there any campaigning in the polling place? Yes No
Describe _____
7. Did you see any effort to intimidate or interfere with individuals seeking to cast a ballot? Yes No
Describe: _____

8. Were there any unauthorized persons in the polling place? Yes No
Describe: _____
9. Were you ever barred from observing the voting process? Yes No
Describe: _____
10. Were voters asked to sign the precinct register? Yes No
11. Were voters asked to show valid ID? (if applicable) Yes No
12. Are individuals whose names do not appear on the precinct register being directed to the proper polling place or to central Election Board office? Yes No
13. Were there any instances in which a voter was permitted to vote a regular ballot (not a provisional) even though voter's name was not on the voter roll. Yes No
If yes, describe: _____
14. Did provisional voters and election judges properly complete and sign certifications on the provisional ballot envelopes? Yes No
15. Are provisional ballots being placed in provisional ballot envelopes, sealed, and placed in the separate provisional ballot box? Yes No
16. Did you observe any voter that voted more than once? Yes No
If yes, describe _____
16. Does anything seem unusual about the polling place? Yes No
If yes, describe: _____

Please describe any incidents / observations that you think deserve particular attention. Please describe the incident or your observation in as much detail as possible including names and official titles if possible:

If an incident was reported to you, please provide the following information about the person who reported it to you: Name: _____ Address: _____ Phone: _____

QUESTIONS TO BE ASKED (if not too intrusive to voting process)

1. Are you a Democrat/Republican? (ask each judge) # Rep _____ #Dem _____
2. How many voters were turned away from the polls?.....
Describe _____
3. How many provisional ballots were given to voters?.....
4. How many spoiled ballots?.....
5. Any difficulties contacting the board for info/resolve problems? YesNo
Describe: _____
6. Is there a phone (or cell phone) available to contact the Election Board? YesNo
7. Do the election judges have a copy of the inactive voter list? YesNo
8. Time absentee/supplemental voter list arrived? _____ #of names on list? _____

WITNESS STATEMENT

NAME: _____

ADDRESS: _____

PHONE: _____ (Election Day) _____ (After Election)

OFFICIAL POSITION (if any): _____

PARTY REGISTRATION: _____

The incident being reported occurred in:

COUNTY: _____ WARD/PRECINCT: _____

POLLING LOCATION: _____

Please record your statement in the space provided below (attach additional sheets if necessary) with as much detail as possible. Include the date and time of the incident as well as the names of the person(s) involved (if possible).

I, _____, have read the above and certify
(PRINT NAME)
it is true and accurate.

(SIGNATURE)

(DATE)

Michael Neal - Political

From: Christopher P. McInerney - Research/Communications
Sent: Monday, October 18, 2004 9:17 PM
To: Shawn Reinschmiedt - Research/Communications; Michael Neal - Political
Subject: RE: Hava return list

Michael-

I need to get our most comprehensive list of numbers tonight to Chairman Gillespie out here in Columbus for his press conference tomorrow. Do you have the original lists that the outreach mailings went to? Or do you know who might have them?

Thanks in advance.

Chris

-----Original Message-----

From: Shawn Reinschmiedt - Research/Communications
Sent: Mon 10/18/2004 9:07 PM
To: Michael Neal - Political
Cc: Christopher P. McInerney - Research/Communications
Subject: Fw: Hava return list

Okay, michael should have that info for you, chris. And michael, chris should have the final 2nd mailing return list.

-----Original Message-----

From: Christopher P. McInerney - Research/Communications <CMcInerney@rnchq.org>
To: Shawn Reinschmiedt - Research/Communications <SReinschmiedt@rnchq.org>
Sent: Mon Oct 18 21:03:47 2004
Subject: Re: Hava return list

I need the entire universe that the second mailing went to. Do you know who has that?

-----Original Message-----

From: Shawn Reinschmiedt - Research/Communications [<mailto:SReinschmiedt@rnchq.org>]
Sent: Mon Oct 18 21:00:14 2004
To: Christopher P. McInerney - Research/Communications
Subject: Re: Hava return list

In any event, if you have it please send...directly to micheal neal, if you could. If not at your fingertips, I'll find it on my computer and send in the morning.

Either way, he should be fine.

Michael Neal - Political

From: Shawn Reinschmiedt - Research/Communications
Sent: Monday, October 18, 2004 9:08 PM
To: Michael Neal - Political
Cc: Christopher P. McInerney - Research/Communications
Subject: Fw: Hava return list

Okay, michael should have that info for you, chris. And michael, chris should have the final 2nd mailing return list.

-----Original Message-----

From: Christopher P. McInerney - Research/Communications <CMcInerney@rnchq.org>
To: Shawn Reinschmiedt - Research/Communications <SReinschmiedt@rnchq.org>
Sent: Mon Oct 18 21:03:47 2004
Subject: Re: Hava return list

I need the entire universe that the second mailing went to. Do you know who has that?

-----Original Message-----

From: Shawn Reinschmiedt - Research/Communications [mailto:SReinschmiedt@rnchq.org]
Sent: Mon Oct 18 21:00:14 2004
To: Christopher P. McInerney - Research/Communications
Subject: Re: Hava return list

In any event, if you have it please send...directly to micheal neal, if you could. If not at your fingertips, I'll find it on my computer and send in the morning.

Either way, he should be fine.

Exhibit 19

POLL WATCHER INSTRUCTIONS

- Hours of operation of Election Day; [cite] voters standing in line at the official closing time are allowed to cast their vote [cite]; if there is an official order extending normal polling hours, voters who arrive after the official closing time may only cast a provisional ballot [42 USC § 15482 & state law cite].
- Prohibition on political activity within __ feet of the polling place. [cite].
- Provisions for disabled voters [cite].
- Relevant ID and/or signature verification statute [cite].
- Right to cast a Provisional Ballot if name is not on the voter roll or required to show ID but cannot do so [cite].
- State law on the counting of Provisional Ballots (i.e., valid if cast within the proper precinct or county) [cite].
- State laws regarding rights of voters who have recently moved, typically within 30 days prior to the election [cite].
- If the voter makes a mistake on his ballot, he may receive replacement ballot/s from election officials prior to his vote being cast. [cite].
- Challenging voters on Election Day [cite].
- Counting ballots / absentee ballots / provisional ballots [cite].
- Challenging the counting of absentee ballots / provisional ballots [cite].

RNC 000135

Exhibit 20

Blaise Hazelwood - Political

From: drachelson@georgewbush.com
Sent: Tuesday, October 26, 2004 6:49 PM
To: RPDs; Randy Enwright - Political; Randy Kammerdiener - Political; Anne Hathaway - Political; David James - Political; John Peschong - Political; Graham Shafer - Political; Kevin Shuvalov - Political; Brett Doster; sshiver@rpof.org; Scott Kopple; Julie Teer; varsalone@aol.com; Scott Jennings; Sara Ister; jay@swcampaigncraft.com; Scott Stewart; chris@nevadagop.org; Robert Paduchik; Darrin Klinger; payne@ohiogop.org; Guy Ciarrocchi; Vince Galko; dhayward@pagop.org; Mark Graul; wiley@wisgop.org; bbrown@rpof.org; mramsey@rpof.org; jjaffer@usa.net; rgregg957@hotmail.com; justinefy@qwest.net; domara@hotmail.com; cmjaarda@yahoo.com; magan@ohiogop.org; Christopher@ohiogop.org;
Cc: mroman@pagop.org; eschutt@wisgop.org; Terry Nelson; Tom Josefiak; Cuddy Johnson; Blaise Hazelwood - Political; Thor Hearne; cguith@georgewbush.com; RPCs; Lauren Barnett - Political; zdeitch@georgewbush.com; Tyler Lown; Elizabeth Toon; Wade Lairsen; John Parker; Caroline Hunter - Legal; Angel Paulson; Jason Huntsberry
Subject: HAVA Election Day Preparation Call #2 - *Wednesday (10/27)* - REMINDER

A quick reminder for tomorrow's (10/27) HAVA Election Day Operations call joined by Ken Mehlman -

Below is an *updated schedule*

Please call/attend during your state's time slot:

5:00-5:30pm - FLORIDA

5:30-6:00pm - IOWA

6:00-6:30pm - NEW HAMPSHIRE

6:30-7:00pm - NEW MEXICO

7:00-7:30pm - NEVADA

7:30-8:00pm - OHIO

8:00-8:30pm - PENNSYLVANIA

8:30-9:00pm - WISCONSIN

Note: All times are EDT

Please also find the agenda for the call:

- 1) HAVA Recruitment and structure:
 - a. # of retained counsel, and jurisdictional coverage
 - b. # of county litigators confirmed
 - c. # of Legal Roving Teams confirmed
 - d. # of poll-watchers confirmed
 - e. # of problem precinct pollwatchers confirmed (subset of point d)
- 2) Need for identification for poll-watchers?
 - a. confirm state plan
 - b. discuss hats, shirts, pins
- 3) Anticipated problems, and our ability to respond
 - a. Democrats keeping poll locations open
 - b. Democrats attempting to shut down Republican poll locations
 - c. Faulty machines
 - d. AB requesters arriving to vote (and saying they did not receive ballot)
 - e. First-time registrants not showing ID
 - e. Same-day registration fraud (where applicable)

RNC 000174

Confidential Information -
Subject to Protective Order

- 4) Ballot Counting:
- a. Timeline and process for AB counting
 - b. Timeline and process for Eday ballot counting
 - c. Timeline and process for provisional ballot counting

Conference Call Information:

866.809.4014

6917461 (passcode for participants)

Headquarters Meeting Location:

Montana West

Please be sure to join –

Thanks!

-----Original Message-----

From: David Rachelson

Sent: Monday, October 25, 2004 11:09 PM

To: RPDs; 'Randy Enwright (renwright@rnchq.org)'; 'Randy Kammerdiener'; 'ahathaway@rnchq.org'; 'djames@rnchq.org'; 'John Peschong - Political'; 'gshafer@rnchq.org'; 'kshuvalov@rnchq.org'; Brett Doster; 'sshiver@rpof.org'; Scott Kopple; Julie Teer; 'varsalone'; Scott Jennings; Sara lister; 'jay@swcampaigncraft.com'; Scott Stewart; 'chris@nevadagop.org'; Robert Paduchik; Darrin Klinger; 'payne@ohiogop.org'; Guy Ciarrocchi; Vince Galko; 'dhayward@pagop.org'; Mark Gaul; 'wiley@wisgop.org'; 'bbrown@rpof.org'; 'mramsey@rpof.org'; 'jjaffer@usa.net'; 'rgregg957@hotmail.com'; 'justinefy@qwest.net'; 'domara@hotmail.com'; 'cmjaarda@yahoo.com'; 'magan@ohiogop.org'; 'Christopher@ohiogop.org'; 'mroman@pagop.org'; 'eschutt@wisgop.org'

Cc: Terry Nelson; Tom Josefiak; Cuddy Johnson; 'bhazelwood@rnchq.org'; Thor Hearne; Christopher Guith; RPCs; 'Lauren Barnett - Political'; Zach Dietch; Tyler Lown; Elizabeth Toon; Wade Lairsen; John Parker; 'Caroline Hunter - Legal'; Angel Paulson; Jason Huntsberry

Subject: HAVA Election Day Preparation Call #2 - *Wednesday (10/27)*

We'd like to arrange a follow-up conference call to discuss **HAVA Election Day Operations on Wednesday (10/27)** – Ken Mehlman will be joining the call –

Please find below the schedule – an agenda will follow.

Please call/attend during your state's time slot:

5:00-5:20pm – WISCONSIN

5:20-5:40pm – IOWA

5:40-6:00pm – NEW HAMPSHIRE

6:00-6:20pm – NEW MEXICO

6:30-6:40pm – NEVADA

6:40-7:00pm – OHIO

7:00-7:20pm – PENNSYLVANIA

7:20-7:40pm – FLORIDA

Note: All times are EDT

Conference Call Information:

866.809.4014

RNC 000175

6917461 (passcode for participants)

Headquarters Meeting Location:
Montana West

Please be sure to join –

Thanks!

Blaise Hazelwood - Political

From: WarRoom [WarRoom@georgewbush.com]
Sent: Monday, October 25, 2004 7:22 AM
Subject: NBC:SEN. KERRY

WNBC-TV (NBC) -- Today

10/25/04 07:08:00

Sen. John Kerry

<http://mms.1veyes.com/ExpandGuest.asp?ln=79598>

KATIE COURIC: on close-up this morning. senator kerry. i caught up with him on sunday. we talked about his trip to philadelphia today with president clinton and the scare tactics used by both sides. the hunts for osama bin laden and the possible legal battle that could follow this election. first senator kerry talked about the sprint to the finish.

SEN. JOHN KERRY: you know, it's incredible how you and i and a lot of people think everybody is swept up by politics every minute. they are not. they are trying to pay the bills. they are trying to get the kids to school and get home and cook a meal and put the kids to bed and hope they are safe. they don't get a lot of time to think about politics. there is a group of americans who come to this race in the last minutes. that's why closing and important.

BILL CLINTON: thank you.

COURIC: this week bill clinton will join you for the first time since his heart surgery. what do you hope he will bring to the campaign?

KERRY: well, obviously, i hope he brings the strength of health and the excitement that bill clinton always brings to the campaign trail. this was a very successful president in terms of policies for our country and people know that. we balanced the budget. we paid down the debt for two years in a row. 6.4-million people were lifted out of poverty. more women came into business ownership. we had equal pay efforts. we raised the minimum wage for people. all things george w. bush has undone or not done. i think that having bill clinton remind americans about importance of this choice and what it can mean to the lives of middle class americans, middle class americans have been left behind by george w. bush.

COURIC: vice-president gore opted not to have the president clinton campaign on his behalf. are you concerned that bill clinton might alienate voters. 38% of voters had a somewhat or negative opinion of him.

KERRY: i am running for president and not bill clinton but bill clinton's policies made a difference to the lives of americans. i want to remind americans there are better choices than george w. bush is making.

COURIC: the election according to almost every poll is extremely tight. we are hearing complaints from both sides about potential voter fraud. lawyers are being hired by the dozens. do you think america will wake up on november 3rd and know who the president is?

KERRY: yes.

COURIC: you are confident of that. why?

KERRY: because i think that americans don't want a repeat of the year 2000. and i think in the end, americans are going to come out in huge numbers. they know their vote counts. we are going to protect people's right to vote.

KERRY VIDEO CLIP: what these folks want you to do is be afraid. everything they are trying to do is scare america.

COURIC: let me and you about the politics of fear. i know on saturday you said the president keeps going around the country trying to scare people. but you have also employed these tactics one might say by saying if the president is elected there might be a draft. people might have to work into their 80s because social security may be in jeopardy. you raised the specter of bio-terrorism based on the flu vaccine shortage. Isn't it the pot calling the pan black?

KERRY: no, not at all. i will tell you why. number one if we have more of the same policy in iraq, where we have nine out of 10 of our active duty divisions are in iraq or coming back or going to iraq, and you face north korea which is a nuclear threat and iran which is an increasing threat and you already have stop loss policy, a back door draft on the reserves and national guard, the president is saying we are making progress and he will do more of the same in iraq. how he does that and get the job done when our own people tell us we don't have enough troops on the ground is beyond me. it's not my

Exhibit 21

Practicing under the supervision of principals of the firm admitted in Pennsylvania.
Admitted to practice in New York only.

Anne Bradbury - Political

From: Mike Roman [mroman@pagop.org]
Sent: Wednesday, October 27, 2004 3:30 PM
To: Anne Bradbury - Political; Courtney Higgins - Political; acooke@pagop.org; Joe DeFelice; Melissa Walters; cmarrone@pagop.org
Cc: Stephanie Steward; elysarczyck@pagop.org
Subject: Fw: HAVA Election Day Preparation Call #2 - *Wednesday (10/27)* - REMINDER and UPDATED AGENDA

Importance: High

I have a call this evening at 8 PM with national. Please provide me, by 6:30 PM, with updated info as follows:

Anne:
Number of Lawyers confirmed (in state & out-state)

Tony:
Number of Litigators confirmed
Number of retained counsel, and jurisdictional coverage

Courtney
Number of Pollwatchers confirmed

Joe / Melissa
Number of Lawyers serving as pollwatchers

Christian
Updated threat Matrix
Updated Election Calendar

Sent from:
Mike Roman
Director of Election Day Operations
Republican State Committee of Pennsylvania
Victory 2004
717-418-1251
mroman@pagop.org

----- Original Message -----

From: Mike DuHaime <mailto:mduhaime@georgewbush.com>
To: Mike Roman <mailto:mroman@pagop.org> ; Guy Ciarrocchi <mailto:gciarrocchi@georgewbush.com>
Sent: Wednesday, October 27, 2004 12:05 PM
Subject: FW: HAVA Election Day Preparation Call #2 - *Wednesday (10/27)* - REMINDER and UPDATED AGENDA

HAVA Call agenda with Ken. Mike, you can take the lead on all these. I will be there to

take the lead in answering his questions.

8:00-8:30pm - PENNSYLVANIA

Please also find the agenda for the call:

- 1) HAVA Recruitment and structure:
 - a. # of retained counsel, and jurisdictional coverage
 - b. # of county litigators confirmed
 - c. # of Legal Roving Teams confirmed
 - d. # of poll-watchers confirmed
 - e. # of problem precinct pollwatchers confirmed (subset of point d)
- 2) Poll Watcher Duties:
 - a. confirm their materials and action
- 3) Need for identification for poll-watchers?
 - a. confirm state plan
 - b. discuss hats, shirts, pins
- 4) Anticipated problems, and our ability to respond
 - a. Democrats keeping poll locations open
 - b. Democrats attempting to shut down Republican poll locations
 - c. Faulty machines
 - d. AB requesters arriving to vote (and saying they did not receive ballot)
 - e. First-time registrants not showing ID
 - f. Same-day registration fraud (where applicable)
- 5) Ballot Counting:
 - a. Timeline and process for AB counting
 - b. Timeline and process for Eday ballot counting
 - c. Timeline and process for provisional ballot counting

Conference Call Information:

866.809.4014

RNC 000132

6917461 (passcode for participants)

Headquarters Meeting Location:

Montana West

Please be sure to join -

Thanks!

-----Original Message-----

From: David Rachelson

Sent: Monday, October 25, 2004 11:09 PM

To: RPDs; 'Randy Enwright (renwright@rnchq.org)'; 'Randy Kammerdiener';
'ahathaway@rnchq.org'; 'djames@rnchq.org'; 'John Peschong - Political';
'gshafer@rnchq.org'; 'kshuvalov@rnchq.org'; Brett Doster; 'sshiver@rpof.org'; Scott
Kopple; Julie Teer; 'varsalone'; Scott Jennings; Sara lister; 'jay@swcampaigncraft.com';
Scott Stewart; 'chris@nevadagop.org'; Robert Paduchik; Darrin Klinger;
'payne@ohiogop.org'; Guy Ciarrocchi; Vince Galko; 'dhayward@pagop.org'; Mark Graul;
'wiley@wisgop.org'; 'bbrown@rpof.org'; 'mramsey@rpof.org'; 'jjaffer@usa.net'; 'rgregg957
@hotmail.com'; 'justinefy@qwest.net'; 'domara@hotmail.com'; 'cmjaarda@yahoo.com';
'magan@ohiogop.org'; 'Christopher@ohiogop.org'; 'mroman@pagop.org'; 'eschutt@wisgop.org'
Cc: Terry Nelson; Tom Josefiak; Caddy Johnson; 'bhazelwood@rnchq.org'; Thor Hearne;
Christopher Guith; RPCs; 'Lauren Barnett - Political'; Zach Dietch; Tyler Lown; Elizabeth
Toon; Wade Lairsen; John Parker; 'Caroline Hunter - Legal'; Angel Paulson; Jason
Huntsberry
Subject: HAVA Election Day Preparation Call #2 - *Wednesday (10/27)*

We'd like to arrange a follow-up conference call to discuss HAVA Election Day Operations
on Wednesday (10/27) - Ken Mehlman will be joining the call -

Please find below the schedule - an agenda will follow.

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5:00-5:20pm- WISCONSIN

5:20-5:40pm - IOWA

5:40-6:00pm - NEW HAMPSHIRE

6:00-6:20pm - NEW MEXICO

6:30-6:40pm - NEVADA

6:40-7:00pm - OHIO

7:00-7:20pm - PENNSYLVANIA

7:20-7:40pm - FLORIDA

RNC 000133

Note: All times are EDT

Conference Call Information:

866.809.4014

6917461 (passcode for participants)

Headquarters Meeting Location:

Montana West

Please be sure to join -

Thanks!

Anne Bradbury - Political

From: Michael W. Gleba [mwg@scaife.com]
Sent: Wednesday, October 27, 2004 12:00 PM
To: 'Melissa Walters'
Cc: Anne Bradbury - Political
Subject: RE: Election Day

Melissa:

I am responding to your e-mail and to Anne's e-mail of last evening (regarding additional training times) to say that while I could be available to work on election day as a poll watcher or roaming attorney (although I still would need to do the training, which I could do on the Thursday evening conference call, and vote by absentee ballot), I have concerns that my involvement might be more of a potential larger problem than an immediate good.

While I would be volunteering and working as an individual, I am afraid that my employment might cause problems if I happened to be at a polling location where some sort of problem was occurring or otherwise involved in a voting problem that drew any media attention. While I am a licensed lawyer in Pennsylvania I no longer actively practice and instead run the day-to-day operations of a couple of private philanthropic foundations in Pittsburgh--the Sarah Scaife Foundation and the Carthage Foundation. As you may be aware, these foundations along with Dick Scaife, their Chairman, have been routinely accused by some on the left, including nationally prominent Democrats and various people in the media, as being part of the "vast right-wing conspiracy." I suspect as well that some people in the Heinz-Kerry camp may harbor similar feelings as they have blamed some of Teresa Heinz-Kerry's bad press on Dick Scaife.

RNC 000134

Exhibit 22

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

DEMOCRATIC NATIONAL
COMMITTEE,
et al.,

Plaintiffs,

v.

REPUBLICAN NATIONAL
COMMITTEE,
et al.,

Defendants.

Civil Action No. 81-3876

JUDGE DICKINSON R.
DEBEVOISE

DECLARATION OF NINA SHAPIRO PERL

1. My name is Nina Shapiro-Perl. I am the Director of Video Services and the Greenhouse Cultural Program for the Service Employees International Union. I have held this position for 10 years.
2. I routinely work with Video Monitoring Services to obtain broadcast footage that is of potential interest to our members. We purchase this footage for non commercial uses; for example, if our members hold press conferences, we will use the footage to show them the press conference or if there are press events that will be

of interest to the programs of the union we obtain footage of those for educational purposes.

3. In this case I requested coverage of a vigil that was organized on Thursday morning the 28th of October because I learned that the Leadership conference on Civil Rights was protesting activities around voter suppression. The vigil was to be held in front of the Republican National Committee Headquarters.
4. I requested the footage of this event from Josh Kittner our account executive. He was able to obtain the footage and deliver it to SEIU headquarters on Friday night, October 29th. This footage is the videotape that is attached to my declaration at Exhibit A.
5. Pursuant to 28 U.S.C. § 1746 and Ohio Stat. § 2921.11, I declare under penalty of perjury that I have read the foregoing and that the facts stated in it are true and correct.

Dated: _____

Nina Shapiro Perl

EXHIBIT A



VMS

"VOTER SUPPRESSION"

CAPITAL REPORT
CNBC NATIONAL
10/28/2004 07:00 PM-08:00 PM
03:03

BET NIGHTLY NEWS
BET NATIONAL
10/28/2004 11:00 PM-11:30 PM
03:20

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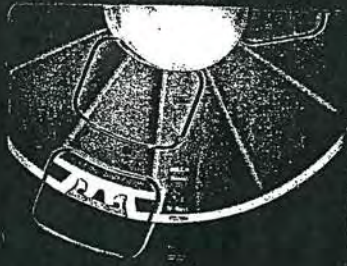
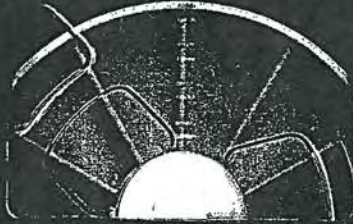


Exhibit 23

UNITED STATES COURTS OF APPEALS
FOR THE SIXTH CIRCUIT

AMY MILLER, et al.,

Plaintiffs-Appellees,

v.

J. KENNETH BLACKWELL, et al.,

Defendants-Appellees,

KEVIN CRAFT and GREG LAWSON,

Intervenors-Defendants-Appellants,

STATE OF OHIO,

Intervenor-Defendant-Appellant.

Nos. 04-4299/4300/4301

Filed: October 29, 2004

Before: KEITH, DAUGHTREY, and CLAY, Circuit Judges.

ORDER

PER CURIAM. Defendant-Appellant, Franklin County Board of Elections, appeals from the district court's October 27, 2004 Order Granting Plaintiffs' Motion for A Temporary Restraining Order and the Motion to Intervene of Kevin Craft and Greg Lawson, and moves this Court for an order staying the district court's decision to grant a temporary restraining order in this case and further expediting the briefing. Intervenors-Defendants-Appellants, Kevin Craft and Greg Lawson, also appeal and move this Court for an order staying enforcement of the district court's order of October 27, 2004 granting plaintiffs a temporary restraining order in this case. In addition, Intervenor-Defendant-Appellant, State of Ohio, appeals, and pursuant to an Emergency Motion for Stay, requests this Court to stay the district court's order or to immediately reverse that order so that the Ohio Secretary of State may proceed with pre-election challenges to voters' registrations between now and the election scheduled for November 2, 2004.

The district court's order granting Plaintiffs' motion for a temporary restraining order and the motion to intervene of Kevin Craft and Greg Lawson, from which the aforementioned parties take their appeals, provides that because Plaintiffs have demonstrated a strong likelihood of success on the merits regarding an alleged violation of their constitutional rights, and because the other factors to consider in granting a temporary restraining order weigh in Plaintiffs' favor, Plaintiffs' motion for a temporary restraining order is granted and Defendant, the County Boards of Elections, is enjoined from issuing notices or conducting hearings, including those already scheduled, regarding the pre-election challenges to voter eligibility at issue

in this case; and Defendant Blackwell, the Ohio Secretary of State, is enjoined from mandating or enforcing the enjoined procedures, pending the court's decision on a preliminary injunction in this case.

The district court has scheduled a hearing for 10:30 a.m. on Friday, October 29, 2004, at which time it will determine whether to convert the temporary restraining order into a preliminary injunction.

This Court is mindful of the practical difficulty of the County Boards of Elections arranging and conducting literally thousands of hearings for all challenged voters between today's date and November 2, 2004 in a manner that complies with all legal prerequisites of county and state election laws without contravening the requirements of the Due Process Clause of the Fourteenth Amendment to the United States Constitution and the National Voter Registration Act, 42 U.S.C. §§ 1973gg *et. seq.* After considering the difficulties posed by the competing concerns of not discouraging or preventing legal voting, on the one hand, and minimizing false registrations and election fraud, on the other hand, and having reviewed the district court's order granting temporary restraining order,

This Court hereby **DENIES** Defendant-Appellant Franklin County Board of Elections' Motion for Emergency Stay of the District Court's Order Granting Temporary Restraining Order and Motion to Expedite Appeal; Motion of Intervenor-Defendants-Appellants Kevin Craft and Greg Lawson for Emergency Stay of District Court's Order Granting Plaintiffs' Motion for Temporary Restraining Order Pending Appeal and Motion to Expedite Appeal; and Intervenor-Defendant-Appellant, the State of Ohio's Emergency Motion for Stay. Inasmuch as the district court is scheduled to proceed with the hearings that it has scheduled for October 29, 2004, this panel will retain jurisdiction with respect to any subsequent appeals taken following that proceeding.

IT IS SO ORDERED.

ENTERED BY ORDER OF THE COURT

/s/ Leonard Green

Clerk

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United States District Court
District of New Jersey

NOV 01 2004

Democratic National Committee, et al.,
Plaintiffs,

v.

Republican National Committee, et al.,
Defendants.

AT 8:30 _____ M
WILLIAM T. WALSH, CLERK

Civil Action No. 81-3876

Judge Dickinson R. Debevoise

**MEMORANDUM IN OPPOSITION TO INTERVENOR'S
APPLICATION FOR A PRELIMINARY INJUNCTION AND
IN SUPPORT OF DEFENDANT'S MOTION
TO MODIFY THE CONSENT DECREE**

Introduction

Based upon the return of official correspondence to her as "undeliverable," the Cuyahoga County Board of Elections has "flagged" Intervenor Ebony Malone for challenge if and when she attempts to vote on November 2, 2004. This challenge by the County Board of Elections is pursuant to state law and is independent of any action by the Republican National Committee or the Ohio Republican Party ("ORP"). Thus, even if this Court were to grant the current motion, Ms. Malone will be challenged. Ms. Malone has asked the Court to engage in a meaningless act; her claim is not justiciable.

But this is not the only reason her claim must fail. She can establish none of the three requirements listed by this Court at the hearing on October 28, 2004. She is suffering, and will suffer, no harm from the ORP's proposed challenges, and thus she lacks Article III standing to seek injunctive relief. Nor can she demonstrate the other requirements for the extraordinary remedy of preliminary injunctive relief. Indeed, her claim may even be moot because the Ohio

Secretary of State has announced that private parties will not be allowed to assert voter challenges. Finally, even if Ms. Malone could otherwise demonstrate that she is entitled to injunctive relief on the basis of the Consent Decree, this Court should modify the Consent Decree or otherwise grant permission to the RNC to undertake the activities at issue.

FACTUAL BACKGROUND

The RNC is submitting with this brief the Declarations of: Shaun Reinschmiedt, Senior Research Analyst at the RNC; Maria Cino, Deputy Chairman of the RNC; Gwen Dillingham, the Deputy Directory of the Board of Elections in Cuyahoga County, Ohio, where Intervenor Ebony Malone is registered to vote; Caroline Hunter, Deputy Counsel of the RNC; Jeff Matthews, Director of the Board of Elections in Stark County, Ohio; and Dr. John Lott, resident scholar at the American Enterprise Institute. The RNC is also submitting excerpts from the depositions of Maria Cino and Philip Klinkner.

The Consent Decrees

This Court is quite familiar with the Consent Decrees at the center of this case. Significantly, in none of the prior proceedings did the RNC concede liability or admit the allegations, although it has for over 20 years operated under the severe restrictions of the Consent Decrees. It is important to recall, however, that the DNC's prior complaints have centered upon allegations of conduct far more egregious than the assertions here – allegations of actual intimidation of minority voters and suppression of voting in targeted minority precincts.

Accordingly, the original Final Consent Decree required the RNC to

(e) “refrain from undertaking any ballot security activities in polling places or election districts where the racial or ethnic composition of such districts

is a factor in the decision to conduct, or the actual conduct of, such activities there and where a purpose or significant effect of such activities is to deter qualified voters from voting; and the conduct of such activities disproportionately in [sic] or directed toward districts that have a substantial proportion of racial or ethnic populations shall be considered relevant evidence of the existence of such a factor and purpose. . . .” November 1, 1982 Consent Decree § 2(e). (emphasis added).

The focus is plainly on activities having a “purpose or *significant* effect” that “deter[s] *qualified* voters,” when “*disproportionately* . . . directed toward districts” with substantial racial or ethnic minority populations. Such an effect, by itself, is not a violation of the Decree, but merely “*relevant evidence*” of such a purpose.

The 1987 Consent Decree explicitly allows the RNC to “deploy persons on election day to perform normal poll watch functions. . . .” *July 27, 1987, Settlement Stipulation*, ¶ B. While the earlier Consent Order “remains in full force and effect,” the 1987 Order states that the RNC, but *not* any *state* party, is restricted from engaging, assisting, participating in any “ballot security program unless the program . . . has been determined by this Court to comply with the provisions of the Consent Order [quoted above] and applicable law.” *Id.* ¶ C. Thus, the ORP is not covered by the Order. Further, it is the RNC’s position that election day challenges to voters who are already “flagged” by county officials are within the normal poll-watching activities expressly permitted by the Decrees.

Indeed, in 1990, this Court found that the DNC had failed to prove that the RNC had “conducted, participated in, or assisted ballot security activities in North Carolina.” *Nov. 5, 1990 Order* at ¶ 1. A similar ruling is appropriate here.

The RNC takes the Consent Decrees very seriously, and makes extensive efforts to insure compliance with them. The RNC’s Chief Counsel Jill Holtzman Vogel and its Deputy Counsel Caroline Hunter conduct regular briefings for each of the RNC’s divisions. *Decl. of Caroline*

Hunter ¶ 2 (Attachment D). They participate in meetings and conference calls with RNC personnel and with state party and campaign personnel when issues of voter registration and election day activities are being discussed. *Id.* They provide counsel on the Consent Decrees to the senior leadership of the RNC, including RNC Chairman Ed Gillespie, Deputy Chairman Mario Cino, Political Director Blaise Hazelwood, and others. As verified by Ms. Hunter's declaration, and out of an abundance of caution demonstrating the severely restrictive effect of the Decrees, the RNC Counsels' office has advised the RNC leadership not to be involved in the ORP's program to challenge voters, and to the best of Ms. Hunter's knowledge that advice has been followed. *Hunter Decl.* ¶¶ 2-4 (Attachment D).

The Ohio Mailings

On or about August 10, 2004, the RNC mailed a letter welcoming all newly-registered voters in Cuyahoga County, Ohio to the political process, and encouraging them to support the Republican ticket. *Cino Decl.* ¶ 4 and Exhibit 3 thereto (Attachment G). Cuyahoga County was the only county in Ohio selected for such a mailing not because it is predominately minority (which it is not), but because voter registration was expected to be heaviest there and the RNC wanted a maximum return on its dollars invested. Unlike letters challenged in prior proceedings before this Court, the August 10, 2004 letter, attached to the Cino Declaration as Exhibit 3, can hardly be characterized as intimidating. Although approximately 3,353 of the RNC letters were returned as undeliverable, *those returned letters have not been used as the basis for any voter registration challenges.* *Cino Decl.* ¶ 4 (Attachment G). Rather, the results of that mailing are being held by the RNC for use as public relations material if the DNC initiates a post-election challenge to the results in the Ohio presidential election. *Cino Deposition Tr.* at 77:3-78:17 (Attachment L).

On or about September 9, 2004, the Republican Party of Ohio sent letters to newly-registered voters in the five Ohio counties with the highest anticipated new registrations: Cuyahoga, Franklin, Summit, Hamilton, and Montgomery. As with the RNC letter, these letters went to all newly-registered voters in those counties, *not* just to minority precincts. Approximately 15,238 letters were returned as undeliverable. *Cino Decl.* ¶ 5 (Attachment G).

Significantly, Intervenor Ebony Malone was not on the mailing list to receive either the RNC letter or the Republican Party of Ohio letter. *Id.* ¶¶ 4-5.

Independently of any activities by the RNC or ORP, the Ohio County Boards of Elections sent informational packages to newly-registered voters, informing the new registrants of the location of their polling stations and other important information. These mailings were sent at various times during 2004. Neither the RNC nor the Republican Party of Ohio had any responsibility for these mailings. *Id.* ¶ 6.

The ORP's Decision to Challenge Questionable Registrations

On or about October 7, 2004, the Republican Party of Ohio began to receive reports that numerous letters sent by the County Boards of Election had been returned as undeliverable. A week later, on or about October 14, 2004, the number of returned letters had swelled to tens of thousands. Approximately 35,247 mailings throughout the state were ultimately returned as undeliverable. A chart showing the number of returned mailings per county is attached as Attachment J. This fact was widely reported in the Ohio press, and became a matter of intense interest to the public, to the ORP, and the RNC. Ebony Malone was on the mailing list for one or more County Boards of Elections, and one or more of her registrations was returned as undeliverable. *Dillingham Decl.* ¶¶ 30-31 (Attachment C).

Concurrently with the reporting of tens of thousands of undeliverable voter packets, the media reported widespread instances in Ohio of voter registration irregularities. As described in the attached Declaration of Shawn Reinschmiedt, a senior research analyst at the RNC, fraudulent voter registration activities by individuals and organizations affiliated with the Democratic Party have been rampant this election cycle. In Defiance County, Ohio this year, for example, the NAACP Voter Education Fund collected highly suspicious voter registration forms in the names of “Dick Tracy,” “Mary Poppins,” and “Janet Jackson” that were obtained by an individual in exchange for a payment of crack cocaine. *See Decl. of Shawn Reinschmiedt* ¶¶ 3(a) (Attachment A). In Summit County, Ohio, the AFL-CIO submitted 50 voter registration cards that election officials have deemed illegitimate on the basis of apparently forged signatures and non-existent mailing addresses. *Id.* ¶ 3(d). And Franklin County, Ohio is investigating hundreds of cases of apparent voter fraud, including 62 suspicious voter registration forms submitted by ACORN and another six submitted by the Columbus Urban League. *Id.* ¶ 3(b).

Voter fraud is by no means confined to Ohio, of course, and it can occur on a massive scale. As reported by the *Miami Herald* in August 2004, for example, the State of Florida has determined that approximately 46,000 persons are registered to vote in both New York and Florida. *Id.* ¶ 4(d). Further, it also appears that up to 1,000 people – a number larger than the margin of victory for President Bush in Florida in the 2000 election – may have voted twice, both in Florida and New York, in the same election over the past several years. *Id.* In another recent example, a single county in New Mexico has uncovered 3,000 questionable voter registration cards containing faulty addresses, signatures, and social security numbers. *Id.* ¶ 4(h). In Colorado an individual admitted this month that she signed herself up to vote 25 times, and

signed up three of her friends 40 times, so that her boyfriend could collect payments of \$2 per registration from ACORN. *Id.* ¶ 4(a).

The October 20, 2004 Press Conference

Against this background, the ORP invited RNC Chairman Ed Gillespie to participate in a press conference on October 20 during Mr. Gillespie's previously-scheduled trip to Ohio to speak at a Franklin County Republican Dinner and meet with the editorial board of the *Columbus Dispatch*. *Cino Supp. Decl.* ¶ 4 (Attachment B). On the evening of October 19, Chairman Gillespie met with officials of the ORP, who detailed the growing evidence of voter registration improprieties, including news reports of forged registrations, criminal investigations, and payments of voter registration workers with crack cocaine, as well as the large volume of Board of Elections mailings returned as undeliverable. In discussing the upcoming press conference, Mr. Gillespie made clear to ORP that he could discuss only the party's concern with voter fraud and the degrading effect such fraud has on the democratic process, both in loss of voter confidence and potentially even affecting the results in a close election. Mr. Gillespie emphasized, however, that the Consent Decree precluded him from discussing any actions to challenge the registrations, or from commenting on such actions at the upcoming press conference. It was agreed that any questions concerning future actions would be handled by ORP Chairman Robert Bennett. *Id.* ¶ 6.

At the October 20, 2004, press conference, the ORP detailed the growing evidence of improper voter registrations. Chairman Gillespie spoke about the general problem of voter fraud, its degrading effect on the democratic process, and the special concern about it in an expected close election. During that press conference, the ORP announced no plan to challenge the voter registrations, and when asked about the existence of such a plan, ORP Chairman

Bennett indicated that the ORP was considering its legal options. *Id.* ¶ 6. Two days later, on October 22, the ORP announced its challenge plan. Neither Chairman Gillespie nor anyone else from the RNC has engaged in, assisted, or participated with the ORP in its challenge to the suspicious voter registrations. *Id.* ¶ 7. Of the 35,000 challenges arguably made by the ORP, only 23,000 remain. *See James Dao, Rulings halt challenges to Ohio voter registrations*, N.Y. TIMES, Oct. 30, 2004.

Ohio Challenge Procedure

As set forth in the Declaration of Jeff Matthews, the Director of the Board of Elections in Stark County, Ohio, there are both pre-election and election day challenges to voters in the State of Ohio. Pre-election day challenges are governed by Sections 3509.19 and 3503.24 of the Election Code. Challenges must be filed no later than 11 days before the election. The voter being challenged must receive notice of the challenge and an opportunity for hearing. On October 29, 2004 the United States District Court for the Northern District of Ohio enjoined the pre-election challenge procedure.

Pursuant to Ohio state law, the Records of Elections in both Stark County and in Cuyahoga County (where Intervenor Ebony Malone resides) “flag” the names of persons to whom undeliverable mail has been sent. If and when such a person appears to vote, the county officials challenge the voter. To respond to the challenge, the voter may file a Form 10-U “Affidavit-Oath Examination of Person Challenged” attesting to his eligibility to vote, and the person will then be allowed to cast a regular ballot. *Dillingham Decl.* ¶ 25 (Attachment C); *Matthews Decl.* ¶ 27 (Attachment E). If the voter refuses to fill out the Form 10-U, the person is offered a provisional ballot. At the present time, 180,221 registrants have been flagged in Cuyahoga County, including Intervenor Malone, and 17,575 have been flagged in Stark County.

Dillingham Decl. ¶ 17 (Attachment C); *Matthews Decl.* ¶ 22 (Attachment E). Despite this number of flagged registrants, neither Ms. Dillingham nor Mr. Matthews anticipates disruptions at the polls on election day. (These two counties have 6 times as many flagged voters as the ORP has challenged in the entire state of Ohio). Typically, a small percentage of flagged registrants appear at the polls to vote, and those that do are processed quickly by the polling station officials. *Dillingham Decl.* ¶ 27 (Attachment C); *Matthews Decl.* ¶ 23 (Attachment E).

Election day challenges by private parties are governed by Section 3505.20 of the Ohio Election Code. A person may be challenged when attempting to vote on the ground that the person is not a U.S. citizen, not a resident of Ohio for thirty days immediately preceding the election, not a resident of the county or precinct, or not 18 years of age. The statute provides procedures that the judges at the polling place will follow if a person is challenged, and specifies questions that the election judges should ask the person challenged, depending upon the basis of the challenge. According to both Ms. Dillingham and Mr. Matthews, election officials follow these procedures and the procedures have been efficient without impeding the ability of other persons to vote. *Dillingham Decl.* ¶¶ 26-27 (Attachment C); *Matthews Decl.* ¶¶ 20-23 (Attachment E). Indeed, a memorandum issued by the Secretary of State on October 20, 2004, entitled “Challenger and Witness Guidelines,” instructs Board of Elections officials that challenges to voters must not obstruct or delay the voting process.

Although the Help America Vote Act extended election day provisional balloting throughout the United States, Ohio has had a provisional balloting procedure for many years. *Matthews Decl.* ¶¶ 15-16 (Attachment E). Thus, unlike election officials in some states, Ohio election officials are well-experienced in provisional ballot procedures. The Challenger and Witness Guidelines policy instructs presiding judges in each county to expel from the polling

place any challenger who attempts to intimidate voters. Moreover, when a voter is challenged, the presiding judge is instructed whenever possible to move the challenged person to an area no less than ten feet away from the poll worker table while resolving the challenge.

Intervenors' Lack of Controversy

Critically, since Intervenor Ebony Malone is on the list of returned mail sent by the Cuyahoga Board of Elections, Cuyahoga County officials will challenge her when she appears to vote, regardless whether the ORP challenges her. *Dillingham Decl.* ¶¶ 32, 34 (Attachment C). Thus, whether Intervenor Malone obtains the relief sought against the RNC or not, she will be challenged at the polls on November 2. Her complaint in this case – that she will be “hassled” when she appears to vote – cannot be solved by this Court. *Deposition of Ebony Malone Tr.* at 74:24-75:6. Accordingly, this Court is powerless to provide effective relief to Ms. Malone.

ARGUMENT

I. THE INTERVENOR’S CLAIM IS NOT JUSTICIABLE BECAUSE THIS COURT CAN GRANT HER NO EFFECTIVE RELIEF.

Article III of the United States Constitution limits the federal judicial power to “cases” or “controversies.” In order to constitute a case or controversy, there must be (1) injury in fact, (2) a causal relationship between the injury and the challenged conduct, and (3) a likelihood that the injury will be redressed by a favorable decision. *See United Food & Commercial Workers Union Local 751 v. Brown Group, Inc.*, 517 U.S. 544, 551 (1996). Non-parties seeking to invoke Fed. R. Civ. P. 71 to enforce a court’s order that allegedly benefits them must still show that they have standing to seek relief. *See Moore v. Tangipahoa Parish School Bd.*, 625 F.2d 33, 34 (5th Cir. 1980).

A. This Court Cannot Redress Intervenor Malone’s Grievance.

Intervenor Ebony Malone has admitted to filing at least four different voter registration forms listing two different addresses. *Malone Decl.* ¶¶ 2-3; *see also Dillingham Decl.* ¶ 31 (Attachment C). She appears on the challenge list not as a result of either the RNC or ORP mailings, but as a result of one or more undeliverable mailings by Cuyahoga County Board of Elections. *Dillingham Decl.* ¶ 31 (Attachment C); *Cino Decl.* ¶ 7 (Attachment G).

Under Ohio law, a county Board of Elections must flag any registrant from whom mail is returned as undeliverable. *Dillingham Decl.* ¶ 13 (Attachment C). Because Intervenor Malone’s mailings from the Cuyahoga Board of Elections were returned as undeliverable, her name has been flagged by the Cuyahoga Board of Elections. Flagged names are challenged on election day by county officials. Accordingly, under the law of Ohio, if and when she attempts to vote on November 2, Intervenor Malone will be challenged, not by the RNC or the ORP, but by the Cuyahoga County Board of Elections. *See Dillingham Decl.* ¶ 32 (Attachment C).

The record in this case makes clear that nothing this Court does in this proceeding will reduce the prospect of Ms. Malone being challenged on election day. Accordingly, her case is not justiciable, and there is no case or controversy for this Court to address. Her challenge must be dismissed forthwith.

In this case, Intervenor Malone will be challenged at the polls on election day regardless of any actions taken by this Court. Any “injury” associated with such a challenge will not be redressed by a favorable decision. Her claim is also not redressable because she will suffer it (by operation of Ohio law) regardless of what this Court does. *Cf. Renne v. Geary*, 501 U.S. 310,

312 (1991) (constitutional challenge to statute was not justiciable in part because alleged injury would occur anyway by operation of a different statute).

B. Intervenor Malone Lacks Article III Standing.

As if this were not enough, Ms. Malone's allegations, even if amenable to redress, do not constitute "injury in fact." She has not been denied the right to vote. No one has threatened her in an effort to intimidate her from voting. In her declaration she asserts that "I am worried that I will be unable to vote on Election Day. Also, I am concerned that challenges made to voters at my precinct may slow down the electoral process and discourage other voters from casting a ballot." This rank speculation cannot support a finding of Article III injury. *See Allen v. Wright*, 468 U.S. 737, 751 (1984) (alleged injury must be "distinct and palpable," not "abstract, or conjectural, or hypothetical") (citations omitted). Indeed, Ohio law demonstrates that Ms. Malone has no injury in fact, because she is guaranteed the right to vote by provisional ballot if necessary. *See* Attachment I.

Moreover, the allegation of worry in Ms. Malone's declaration is contradicted by her sworn deposition testimony, in which she expounds on her belief that she will be able to vote regardless of the outcome of this litigation:

Q: To your knowledge, has ACORN contacted the County Board of Elections on your behalf?

A: Yes, I believe they said they did try to talk to someone at the board on my behalf.

Q: Is this something that Stewart told you on October 25?

A: Yes.

Q: What did he say about that conversation?

A: Just that they were working with the board to try to correct the problem and ensure that I would be able to vote.

Q: So was it your understanding that ACORN was working with the board to make sure that you could vote?

A: Yes, that it was trying to come together on my behalf. That was my understanding.

Q: Do you believe that you will be able to vote as a result of those efforts?

A: Yes, I do.

Q: Is that true regardless of what happens with the litigation that we are here for?

A: I would like to think so.

Deposition of Ebony Malone Tr. at 26:14-27:13.¹ Ms. Malone further explained that all she is seeking in this litigation is the “right to prove that I’m eligible to vote and to be able to do so.” *Id.* at 28:9-10. Thus, Ms. Malone testified that the injury she perceived when she agreed to be an intervenor in this suit – the threat to her right to vote – has already been cured. She believes she will be able to vote. Ms. Malone also admitted in her deposition that she will not be discouraged from voting or intimidated by any challenges that take place at the polls on Election Day. *Id.* at 73:5-17. Additionally, she stated that she will vote no matter what delay Election Day challenges may cause:

Q: Am I correct, you will stay and vote, no matter how long it takes?

A: Absolutely.

Id. at 77:19-21.

¹ Citations to the Deposition of Ebony Malone are to the Rough ASCII transcript provided by the court reporter at the conclusion of the deposition.

Given that Ms. Malone is no longer alleging an injury in fact, she lacks standing, and there is no jurisdiction for this proceeding to continue.

C. The Intervenor's Claim May Well Be Moot.

Ohio Secretary of State Ken Blackwell has issued an order barring challengers of all parties from Ohio polling places. *See* Attachment K. Although the matter may be subject to litigation, it is quite possible at this juncture that Intervenor Malone's claim for preliminary injunctive relief will be moot, because no partisan challengers will be permitted within Ohio polling places on Election Day.

II. THE RNC HAS COMPLIED FULLY WITH THE LETTER AND SPIRIT OF THE CONSENT DECREE.

At the October 28, 2004, hearing, this Court indicated that:

"I suppose we're down to three, three critical questions. One is whether the RNC had anything to do with it? Second is, how the list is going to be used, and what the impact on the actual voting will be? And the third is, is there a racial impact?"

Despite extraordinary efforts by the parties and counsel over time past four days, it is now apparent that Intervenor cannot meet her burden on any of these questions. The results of factual investigation have confirmed that Intervenor Malone has been "flagged" by county officials for challenge on election day pursuant to state law. Because the Consent Decrees authorize the RNC to participate in normal poll-watching activities, it is the RNC's position that a challenge by a statutorily-authorized poll challenger, based on statutory grounds, using information provided by the Government, is comfortably within allowable poll-watching activities. Accordingly, the RNC seeks an order allowing it to participate in such challenges on election day.

A party alleging non-compliance with an injunction or a consent decree has the burden of establishing non-compliance with “clear and convincing evidence.” *Ford Motor Co. v. B&H Supply, Inc.*, 646 F. Supp. 975, 1002 (D. Minn. 1986). It is plain that Intervenor Malone falls far short of meeting this burden.

A. The RNC Is Not Responsible For the Registration Challenges.

After extensive investigation, the RNC’s Deputy Chairman Maria Cino has testified that the ongoing challenge to voter registrations in Ohio was the brainchild of the ORP, not the RNC, and that the RNC was not asked to approve or participate in that program. Cino Supp. Decl. ¶ 7. RNC Deputy Counsel Caroline Hunter confirmed in her declaration that the RNC Counsel’s office monitors meetings and telephone calls at which voter registration, get-out-the-vote, and poll watching activities are discussed to ensure compliance with the Consent Decrees. *Hunter Decl.* ¶ 2(c) (Attachment D). The evidence is now undisputed that the RNC’s August 10 mailing has not been used in any way to conduct a ballot security program. *Cino Decl.* ¶ 4 (Attachment G). Although Intervenor relied on ambiguous press reports of RNC Chairman Ed Gillespie’s comments at an October 20 press conference to assert RNC collaboration, the factual record about that press conference shows that: (1) as of October 20, the ORP had formulated no plan to challenge the registration and made that clear at the press conference; and (2) Chairman Gillespie spoke at the press conference only about the degrading effects of fraud on the democratic process. Thus, it is apparent that the RNC cannot be held responsible for the registration challenges, and that an injunction against the RNC prohibiting its involvement in the challenges would be ineffective because the true challenger, the ORP, is neither a party to the Consent Decrees nor before the Court.

B. Challenges on Election Day Will Not Unreasonably Disrupt Voting in Ohio.

Even if the RNC could be deemed complicit in the registration challenges, the record makes clear that challenges by the ORP to suspicious voter registrations will not disrupt the election process. To begin with, press reports make clear that the number of active challenges has declined to 23,000. *See James Dao, Rulings halt challenges to Ohio voter registrations, N.Y. TIMES, Oct. 30, 2004.* In a state as large as Ohio, 23,000 challenges over the course of election day is not system-threatening, and Intervenor has identified no precincts – much less minority precincts – where problems are expected. This number of challenges is a small fraction of the number that will be challenged in Cuyahoga County alone by county election officials.

Second, and relatedly, Cuyahoga County already has 180,221 registrants flagged for challenge by county election officials. *Dillingham Decl.* ¶ 17 (Attachment C) That number likely includes all, or virtually all, of the registrants being challenged by ORP. Likewise, Stark County has flagged 17,575 of its 267,979 registrants. *Matthews Decl.* ¶ 22 (Attachment E). Yet, officials from both counties express confidence that the challenges can be handled on election day without undue disruption to the election process. *Dillingham Decl.* ¶¶ 26-27 (Attachment C); *Matthews Decl.* ¶¶ 20-23 (Attachment E). Plainly, Intervenor's alarmist cries that the challenges will disrupt voting and turnout throughout Ohio are specious.

C. Any Minimal Disruption Caused by the Challenges Is Not Racially Motivated.

Even if the Court were to find that the RNC is participating in the challenges, and even if the Court were to find that the challenges will severely disrupt voting procedures on election day, there is simply no basis for concluding that the impact will be racially disparate, or that the challenges are racially motivated.

For a claim of disparate impact to be established, there must be a showing of a statistical disparate impact. Put another way, to state a disparate impact claim there must be evidence that the “questioned policy or practice has had a disproportionate impact.” *EEOC v. Greyhound Lines, Inc.*, 635 F.2d 188, 192 (3d Cir. 1980); *see also id.* (“This conclusion should be as obvious as it is tautological: there can be no disparate impact unless there is a disparate impact.”). In the absence of any showing by Intervenor of a disparate impact on minority voters, there can be no violation of the Consent Decrees.

To begin with, Intervenor’s suggestion that the challenges will have a disparate racial impact is wholly without basis. Professor Klinkner’s analysis is so flawed as to have no probative value. First, Professor Klinkner, cherry-picked two counties with high African American populations for his analysis. With no apparent explanation, he conducted *no* analysis of the challenge list on a statewide basis, even though the challenges are being pursued statewide. As a legal as well as a purely statistical matter, Professor Klinkner’s failure to analyze the impact in counties with smaller minority populations makes it impossible for him to conclude that there is a legally sufficient disparate impact. In *EEOC v. Greyhound Lines, Inc.*, the Third Circuit rejected a claim of disparate impact that was based on statistical evidence that African American men have a high incidence of a facial disease that was worsened by Greyhound’s “no beard” policy. 635 F.2d at 192. The EEOC presented no evidence of the effect of the policy on whites. The court pointed out that it is impossible to find a disparate impact on one group until the full effect of a policy on the allegedly favored group is also evaluated. “Without comparative statistics showing the percentage of white males who suffer from diseases or skin conditions that make shaving painful or impossible, EEOC’s evidence that many black males are unable to shave because of PFB simply does not permit the inference of a disproportionate impact.” *Id.*

Thus, Professor Klinkner's exclusive focus on counties with large African-American populations is fatal as a matter of law as well as statistics and common sense.

Second, Professor Klinkner failed to take account of alternative explanations for the distribution of challenges. A simple regression analysis using a single test variable is highly unreliable. *Lott Supp. Decl.* ¶ 3 (Attachment F).

Third, Professor Klinkner's own data disproved his assertion that "the percentage of voters that are challenged increases as the black composition of the precincts goes up." *Klinkner Decl.* ¶ 1. Indeed, at his deposition, Professor Klinkner graphed out the distribution of his own data showing a jagged rather than linear line; in some instances, being African American suggests a *lower* chance of being challenged. *Klinkner Tr.* at 110:18-112:22 (Attachment H).

Once the plain errors of Professor Klinkner's analysis are corrected, as Dr. Lott has done, it is apparent that there is no relationship between the challenges and race. *Lott Supp. Decl.* ¶ 16 (Attachment F). But, under the Consent Decrees, even if a disproportionate impact of the challenges on minorities could be shown – and it cannot – that would merely "be considered *relevant evidence* of the existence of such a factor and purpose." It is certainly not "clear and convincing evidence" as required here, and would not establish any improper racial motivation for the challenges. *See November 1, 1982 Consent Decree* at ¶ 2(e). Case law makes clear that even a statistical demonstration of disproportionate impact, standing alone, is insufficient to establish a racial motivation in violation of the law. *See, e.g., Washington v. Davis*, 426 U.S. 229, 239-42 (1976); *Village of Arlington Heights v. Metro. Housing Dev. Corp.*, 429 U.S. 252, 265 (1977). Here, even if Professor Klinkner's specious argument were deemed to be "relevant evidence" of a disparate impact, the record is otherwise devoid of any suggestion that the ORP's

statewide voter registration challenges based upon mailings by the County Boards of Elections and returned as undeliverable have any improper racial motivation. Accordingly, Intervenor is entitled to no relief.

III. THE INTERVENOR HAS NOT SATISFIED THE OTHER ELEMENTS NECESSARY FOR PRELIMINARY INJUNCTIVE RELIEF.

The Intervenor has showed no injury, irreparable or otherwise, to justify preliminary injunctive relief. She admits that she is going to be able to vote in this election. The complete absence of any harm to Intervenor is an independent basis to deny her motion. *Cf. Ecri v. McGraw-Hill, Inc.*, 809 F.2d 223, 226 (3d Cir. 1987) (“Establishing a risk of irreparable harm is not enough. A plaintiff has the burden of proving a ‘clear showing of immediate irreparable injury.’”).

Even if the Intervenor had demonstrated a likelihood of prevailing on the merits and clear immediate injury, the harm to the RNC and the public interest from an injunction would outweigh any benefit to Intervenor. The RNC is national party committee that is fully engaged in lawful electioneering activities in Ohio and elsewhere on the eve of a national election. Ohio law plainly permits the voter challenge process at issue here; indeed, there is clear evidence that Cuyahoga County election officials themselves will make the challenges. Ohio law recognizes the danger of fraudulent voting, and strikes the appropriate balance in ensuring that only properly registered persons actually vote in the election. Injunctive relief here will disrupt the RNC in connection with its lawful activities in a major state and obstruct reasonable efforts to ensure the integrity of the vote. Simply put, to construe the Consent Decrees as prohibiting the RNC from the very same activities that the county officials are obligated to pursue would be unreasonable, and demonstrates the oppressive effect the Decrees are having on the RNC’s legitimate activities.

In this regard, it should be emphasized that Intervenor has not alleged that the RNC's activities actually violate or purport to violate any of the underlying provisions of federal law that served as the basis of the complaint filed in this action in 1981. Nor could any such allegation be colorably made. Federal and state law permit the activities at issue here – the only question is whether such activities violate a consent order entered over two decades ago.

IV. TO THE EXTENT THAT INTERVENOR IS OTHERWISE ENTITLED TO RELIEF, THE COURT SHOULD MODIFY THE CONSENT DECREE OR OTHERWISE APPROVE THE CHALLENGED ACTIVITIES OF THE RNC.

A. The RNC Recently Has Found Evidence of Massive Voter Registration Irregularities.

In these last days and weeks leading up to the election, the RNC has learned that various groups closely aligned with the DNC have allegedly engaged in massive voter registration improprieties in several states. The widespread revelations, as Intervenor suggests, have overwhelmed the system and forced extraordinary measures to be employed by all involved. These revelations are set forth in detail in the Declaration of Shawn Reinschmiedt (Attachment A).

In Ohio alone, the return of tens of thousands of letters sent by the County Boards of Election, a fact widely reported in the Ohio press, coupled with media reports of widespread instances in Ohio of voter registration irregularities, has engendered considerable concern about the integrity of the system. In particular, ACORN has been accused of wide scale voter registration improprieties in a number of so-called battleground states, including Ohio. And in Florida, for example, ACORN is under criminal investigation for voter registration fraud.

Intervenor's declaration demonstrates first-hand the allegedly improper voter registration activities that recently have been unearthed. Ms. Malone indicates under oath that she registered once in November 2003, and then registered "about three times between February 2004 and September 2004," for a total of four registrations. *Malone Decl.* ¶¶ 2-3.

The ORP has responded in measured and appropriate ways, while the RNC has remained on the sidelines. The ORP initiated state-wide statutory challenges to voter registrations without regard to county, ethnicity, or even party affiliation (since voters do not register by party in Ohio). And it should be allowed to continue its work, not handcuffed days before the election.

B. The Court Should Authorize the RNC To Take Reasonable, Non-Discriminatory Measures To Prevent Fraud.

The Consent Decree contemplates that the national party committees will engage in measures to prevent or remedy voter fraud, and the intent of the Consent Decrees is to encourage reasonable and responsive activity, while ensuring that such activities are undertaken within the bounds of the law. *Consent Decree* § 3. To the extent these challenges are not already authorized by the Decrees, the 1987 amendments to the Consent Decrees would require the RNC to seek approval of the Court to engage in such activity. *See July 29, 1987 Consent Decree* § C. In the ordinary course, the RNC would be expected to provide the DNC with 20 days notice. *Id.*

As outlined above, the RNC does not believe that it has engaged in activity in violation of the Consent Decrees. It learned of apparent massive voter registration improprieties in Ohio and elsewhere very recently and should be allowed to work with the ORP in taking appropriate actions to deal with these revelations. To the extent necessary, therefore, the RNC requests the Court's approval to take such appropriate, non-discriminatory action as is reasonably required.

The RNC expects that Intervenor will argue that the RNC has not provided the DNC with sufficient notice of its proposed ballot security activity. The argument places form over substantial need. This is not the ordinary course for the political parties, and the notice procedures outlined in the Consent Decree, as last amended, do not adequately account for the emergency circumstances arising in the current election cycle. The kind of activity that the Decree contemplated that the national party committees might employ were pre-planned election-day activity amounting to voter intimidation at the polls. *See* Int. Memo. at 5-7 (describing historical allegations). That was the type of activity alleged in the original DNC complaint in 1981, from which the Consent Decree arose. *Id.* The Decree did not contemplate allegations of the kind of massive campaign of voter registration improprieties present today, nor the kind of efforts that might need to be implemented to prevent it.

Moreover, insofar as allegations of widespread voter fraud arose only within the last month, weeks, or days prior to the election, the notice provision should not be read exclusively to paralyze the RNC from making any response. Clearly, voter intimidation and discriminatory practices must be avoided by both parties, but the Consent Decree cannot be read to handcuff a party from responding to apparent fraud merely because the fraud was concealed prior to the 20-day notice period. The Consent Decree was never intended to address such a situation and does not address it. To the extent the Consent Decree can be so read, it should be interpreted in a way that conforms to its purpose and intent, or modified further. *See Rufo v. Inmates of Suffolk Co. Jail*, 502 U.S. 367, 375 (1992) (adopting flexible interpretation of consent decree based on change in facts and circumstances).

CONCLUSION

For the foregoing reasons, Intervenor's application for a preliminary injunction should be denied, or in the alternative, the prior Consent Decrees of this Court should be modified as necessary.

October 31, 2004

Respectfully submitted,

/s/ Bobby R. Burchfield / DAH
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Certificate of Service

I hereby certify that the foregoing document was served by hand-delivery on October 31, 2004, upon:

John W. Nields, Jr.
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Laura S. Shores
Ari N. Rothman
Howrey Simon Arnold & White LLP
1299 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

It was also served in hard copy upon Intervenor's New Jersey counsel.

McDermott Will & Emery LLP

By:



Michael S. Nadel

United States District Court
District of New Jersey

**Democratic National Committee, *et al.*,
Plaintiffs,**

v.

**Republican National Committee, *et al.*,
Defendants.**

Civil Action No. 81-3876

Judge Dickinson R. Debevoise

DECLARATION OF SHAWN REINSCHMIEDT

1. My name is Shawn Reinschmiedt. I am a Senior Research Analyst at the Republican National Committee ("RNC"), 310 First Street, SE, Washington, D.C. 20003. I have held this position since August 5, 2002. This Declaration is based upon facts within my personal knowledge and ascertained as part of the RNC's ongoing investigation into the issues raised by this legal action.

2. The RNC engages in ongoing efforts to chronicle acts of illegal and fraudulent voter registration activities nationwide, particularly those conducted by organizations affiliated with the Democratic Party. In my experience, such activities are common occurrences, and they appear to be particularly rampant this election cycle. Organizations such as American Community Organizations for Reform Now ("ACORN"), America Coming Together ("ACT"), and other groups that have close ties to the Democratic Party have been publicly and repeatedly implicated in apparently fraudulent activities involving voter registration. Reported examples of these activities abound, and this Declaration sets forth only a handful of the recent reports from Ohio and elsewhere.

3. In Ohio, for example:

a. in Defiance County this month, Mr. Chad Staton was charged with filing more than 100 fraudulent voter registration forms, including ones in the names of Mary Poppins, Dick Tracy, and Janet Jackson, in exchange for a payment of crack cocaine. Mr. Staton submitted the forms to the NAACP Voter Education Fund. *See James Dao, No Kidding Dick Tracy*, N.Y. TIMES, Oct. 20, 2004, at 22 (Exhibit 1 hereto);

b. in Franklin County, hundreds of cases of suspected election fraud are under review. Tellingly, the County has 30,000 more registered voters than it has residents of voting age. One voter registration, for example, was signed in the name of a man who died in February 2004. Another 25 voter registrations are in the same name, listing 25 different addresses in the County. Of the suspicious voter registration forms, six were submitted by representatives of the Columbus Urban League, and 62 others were submitted by ACORN. Also under investigation are voter registrations for Mr. Nuradin Abdi, an illegal immigrant from Somalia who has been charged with plotting to blow up a shopping mall in Columbus, Ohio, and who is not legally permitted to vote but somehow has remained on the voter rolls. *See Jon Craig, A Dirty tale of duplications, even terrorists, on voter lists; Long Gone But Still Registered; Ohio's Election Day rolls include people who couldn't - and shouldn't - vote*; COLUMBUS DISPATCH, Oct. 24, 2004, at 1A (Exhibit 2 hereto); *Election Fraud Cases Under Review*, WBNS-TV, Oct. 21, 2004 (Exhibit 3 hereto);

c. in Lake County, the NAACP National Voter Fund submitted a voter registration for a man who has been dead for two decades. Other examples of apparent fraud in Lake County include dozens of people on one street – an “entire neighborhood,” according to an elections official – who filed for absentee ballots, a seemingly inexplicable coincidence but for

fraud. *See* Michael Scott, *Dead Man on Voter Rolls Sparks Inquiry*, CLEVELAND PLAIN DEALER, Sept. 23, 2004, at A1 (Exhibit 4 hereto);

d. in Summit County, the AFL-CIO submitted approximately 50 voter registration cards that County election officials have deemed illegitimate on the basis of apparently forged signatures and non-existent mailing addresses. *See* Lisa A. Abraham, *Prosecutor to probe voter fraud; Dozens of Summit registration cards have forged signatures, fake addresses*, AKRON BEACON J., Aug. 25, 2004, at B1 (Exhibit 5 hereto); and

e. in Mahoning County, Elections Director Michael Sciortino has flagged 48 voter registration cards that were part of a group of about 325 submitted by the Cleveland chapter of the NAACP. Many of the cards appear to be in the same handwriting, and the purported registrants have repeatedly advised Mr. Sciornino's staff that they did not, in fact, sign the cards. *See* Lisa A. Abraham, *Suspicious Voter Cards Are Piling Up*, AKRON BEACON J., Sept. 29, 2004 (Exhibit 6 hereto).

4. Similarly, examples of voter fraud in states other than Ohio include the following:

a. in Colorado, Kym Cason admitted to signing up three of her friends to vote 40 times to help her boyfriend, an ACORN worker, who earned \$2 for each voter he signed up. Ms. Cason acknowledged that she forged her friends' signatures and filled out their information to the best of her knowledge. She also signed herself up to vote 25 times. *Investigation Reveals Potentially Fraudulent Voter Forms*, ASSOCIATED PRESS, Oct. 12, 2004 (Exhibit 7 hereto). The Western Regional Director of ACORN, who purportedly was cooperating with Denver authorities to track down several hundred fraudulent applications collected by the organization, downplayed the severity of the problem. "Registration fraud is different than voter fraud," he argued. "Just because you register someone 35 times doesn't mean they get to vote 35 times."

See Valerie Richardson, *Colorado to Tackle Voter-Fraud Fears*, WASH. TIMES, Oct. 14, 2004, at A1 (Exhibit 8 hereto);

b. also in Colorado, workers for the organization “Choose 2 Vote” were paid \$3 per voter registration application if the voter registered Democrat, unaffiliated or independent, but the workers were paid nothing for Republican registrations. A “Choose 2 Vote” spokesman, Mr. Derrick Lee, admitted to a Denver television station that he was only interested in registering Democrats because “The Republicans weren’t paying money for voter registrations.” Lee would not say which Democratic individuals or organizations funded his voter registration drive. “I have folks who were willing to pay me to do it,” said Lee. In August, “Choose 2 Vote” worker John McCarthy was charged with forgery and procuring false registrations for nearly 50 voters. *I-Team uncovers partisan tactics in Colorado voter registration drives*, 9 NEWS, Oct. 10, 2004, at C-05 (Exhibit 9 hereto);

c. in Florida, election officials have asked prosecutors to investigate possible voter fraud involving 25 registration forms with apparently fraudulent addresses, including some that match a public park, a parking lot, and a utility building. Most of the remaining addresses do not exist, and only one actually matches an occupied residence. Residents of the occupied home, however, claim that they do not know the person registered at the address. Brendan Farrington, *Florida prosecutors asked to probe possible voter fraud*, ASSOCIATED PRESS, Oct. 7, 2004 (Exhibit 10 hereto);

d. more significantly, Florida has determined that an estimated 46,000 people are registered to vote in both New York and Florida. As many as 500 to 1,000 people – a number greater than the margin of victory for President Bush in the state in 2000 – may have voted in

both Florida and New York in the same election over the past several years. Erika Bolstad, *Snowbirds Urged to Switch*, MIAMI HERALD, Aug. 30, 2004 (Exhibit 11 hereto);

e. also in Florida, the voting rolls include "Howard The F. Duck" of Coconut Creek, who is registered in Broward County. Meanwhile, the Florida Department of Law Enforcement has been investigating 925 convicted felons who have lost voting rights but either already voted or have requested absentee ballots for this election. See Tim Reynolds, *Broward mailing new ballots, Florida GOP warns of disenfranchisement*, MIAMI HERALD (Miami.com), Oct. 28, 2004 (Exhibit 12 hereto);

f. in Racine, Wisconsin, the district attorney is investigating seven voter registration applications filed by ACORN affiliate "Project Vote" in the name of people who claim that the group never contacted them. A "Project Vote" worker has since admitted that he never met or spoke with any of the people whose applications he submitted and signed for them. See Tom Kertscher, *Registration Fraud Takes Advantage of Security Rules*, MILWAUKEE J. SENTINEL, Oct. 4, 2004, at B1 (Exhibit 13 hereto);


g. in Missouri, the Secretary of State has asked a county prosecutor to investigate cases of voter fraud through which more the 300 people apparently voted twice in the same election. At least three people acknowledged to a local newspaper that they had voted in both Missouri and Kansas in the same election in 2000 or 2002. Greg Reeves, *Prosecutor Urged to Examine Reports of Double Voting*, THE KANSAS CITY STAR, Sept. 9, 2004 (Exhibit 14 hereto);


h. in New Mexico, a single county has uncovered 3,000 questionable voter registration cards containing faulty addresses, signatures, and social security numbers. Of these, roughly 400 cards were undeliverable to the registrants' stated addresses. Shea Andersen, *Clerk: Voter Forms 'A Mess,'* ALBUQUERQUE TRIBUNE, Aug. 17, 2004 (Exhibit 15 hereto); and

i. in Michigan, campaign workers in several Michigan counties are under investigation for voter-registration fraud, suspected of attempting to register nonexistent people or forging applications for already-registered voters. State Elections Director Christopher Thomas has said that he hopes criminal prosecutions will take place. Mr. Thomas, who has held his post for more than 20 years, also said that the scale of voter-registration drives this year, and the level of irregularities, were like nothing he had seen before. Detroit Elections Director Gloria Williams said that of the several thousand new registrations her office has been receiving daily, about half are duplicates of people who are already registered. *See Dawson Bell, Campaign Workers Suspected of Fraud*, DETROIT FREE PRESS, Sept. 23, 2004. (Exhibit 16 hereto).

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: October 30, 2004


Shawn Reinschmidt

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The New York Times October 20, 2004 Wednesday

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October 20, 2004 Wednesday
Late Edition - Final

SECTION: Section A; Column 1; National Desk; CAMPAIGN BRIEFING: REGISTRATION; Pg. 22

LENGTH: 94 words

HEADLINE: NO KIDDING DICK TRACY


BYLINE: By James Dao (NYT)

BODY:

A 22-year-old was arrested in Ohio on charges that he filed more than 100 falsified voter registrations. The man, Chad Staton, told investigators that a Toledo woman paid him in crack cocaine to collect the forms, which she turned over to an N.A.A.C.P. official in Cleveland, Sheriff David J. Westrick of Defiance County said. Election workers became suspicious when they noticed names like Janet Jackson, Dick Tracy and Mary Poppins on the forms. The NAACP National Voter Fund said in a statement that Mr. Staton was not one of their volunteers. James Dao (NYT)


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Columbus Dispatch (Ohio) October 24, 2004 Sunday, Home Final Edition

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Columbus Dispatch (Ohio)

October 24, 2004 Sunday, Home Final Edition

SECTION: NEWS; Pg. 01A

LENGTH: 1073 words

SERIES: Campaign 2004

HEADLINE: A dirty tale of duplications, even terrorists, on voter lists;
LONG GONE BUT STILL **REGISTERED**;
Ohio's Election Day rolls include people who couldn't - and shouldn't - vote

BYLINE: Jon Craig, THE COLUMBUS DISPATCH

BODY:

A dirty tale of duplications, even terrorists, on voter lists

Ohio's voter-registration rolls are dirty, containing more than 122,000 apparent duplicates as well as the names of people who moved out of state in the 1990s, a local murder victim and even a pair of accused terrorists.

Among supposedly eligible voters in Franklin County are suspected terrorists arrested for alleged plots to blow up the Brooklyn Bridge and a local shopping mall. As an imprisoned felon, one is ineligible to vote. The other, from Somalia, is not a U.S. citizen and thus broke state and federal laws when he **registered** in 1999, officials said.

Also on the voter rolls is an Upper Arlington man who moved to Washington state in the late 1990s, **registered** there, later moved to New York and now is **registered** there.

And the list includes a Columbus man's adult children who moved out of state in 1997 and 1993 -- despite the father's attempt to get them removed.

"That's really disturbing," said Ohio State University law professor Terri Enns. "There certainly are potential problems, but there are a lot of (Election Day) safeguards to keep it from swaying the election."

Accused terrorists **Nuradin Abdi**, 32, and Iyman Faris, 35, are **registered** to vote in Ohio. An indictment unsealed in U.S. District Court in June said Somali immigrant Abdi and admitted al-Qaida member Faris plotted with a third Columbus man to attack a mall.

Fred Alverson, a spokesman for the U.S. Justice Department, said Abdi's false registration may violate state and federal law. In fact, the application he signed -- swearing he is a U.S. citizen -- notes that election falsification is punishable by up to six months in prison, a fine of

\$1,000 or both.

Faris, a Columbus truck driver, is serving a 20-year sentence after admitting that he scouted the Brooklyn Bridge in New York and other potential targets for al-Qaida as recently as March 2003. As an incarcerated felon, he will not be allowed to vote. Faris, from Kashmir, became a naturalized citizen in 1999.

A Dispatch computer analysis of current voter-registration rolls for all 88 counties identified at least 60 Ohio voters whose names have been **registered** three or more times.

Part of the problem stems from the names of inactive voters that clog registration lists.

Franklin County has more than 227,000 inactive voters -- about a quarter of the county's **registered** voters.

Voters are labeled "inactive" once they have failed to vote in two federal-election cycles and don't respond to confirmation cards. Almost 1.9 million of Ohio's more than 8.5 million **registered** voters haven't cast a ballot since at least 1999, the Dispatch analysis found.

The inactives are a key reason the number of **registered** voters in at least seven Ohio counties -- including Franklin, Cuyahoga and Licking -- exceeds the estimated voting-age population. Franklin County tops the list, with at least 30,000 more **registered** voters than residents who are at least 18 years old.

Franklin County elections officials blame a computer glitch caused by conversions made to guard against the Y2K bug for 94,000 of the inactive voters.

Matthew Damschroder, county elections director, said a database containing the names of people who were mailed confirmation letters was lost after the county installed faulty Y2K software in 1999.

Instead of purging the names of those voters, Damschroder said a decision was made to restart the four- to eight-year clock for removing their names. "We decided to err on the side of the voters," he said.

Damschroder and Carlo LoParo, spokesman for Secretary of State J. Kenneth Blackwell, said there are procedures in place to assure people don't vote under the names of inactive voters Nov. 2.

"The poll book is the first line of defense," LoParo said.

The books are marked reminding poll workers to ask inactive voters to verbally verify their addresses.

Also, if a signature doesn't match the one on record, poll workers can ask further questions. Ultimately, a voter can be asked to present a driver's license or utility bill to prove residency.

Michael Vu, director of the Cuyahoga County Board of Elections, said the goal is to prevent fraud, not drive people from the polls.

Franklin County's voter list included the name of Brian C. Muha, an 18-year-old Westerville man murdered in Steubenville on Memorial Day 1999. His mother, Rachel, vaguely recalled getting his voter-confirmation card in the mail.

"It seems to me we received a card a few years ago telling us where Brian could vote," she said last week. "I suppose I should have called the board of elections. We haven't received (a

reminder) for this election."

Jerome R. Schindler, 61, of Columbus, said he notified poll workers, several times, that two of his children moved out of Ohio in the 1990s, "and they supposedly reported it to the board of elections. I have very little confidence in the way it's run."

The county registration list still includes Anne Schindler, 33, who moved to Wilmington, N.C., in 1993 and her brother, Mark, 35, who moved to Minneapolis in 1997.

Theodore Hallett Nordlander, 32, is still **registered** to vote in Upper Arlington, but voter information in Washington state and New York shows Nordlander voted in Seattle in 2000 and 2001 and in Brooklyn, N.Y., in 2002. He could not be reached for comment last week.

The Dispatch computer analysis used a 67-county voter-registration list from the secretary of state (5,752,140 records as of Oct. 14) and a voter-registration list from the Franklin County Board of Elections (816,639 records as of Sept. 24). The remaining 20 counties came from the secretary of state as of May 2004 (1,223,920 records).

The file was sorted into two files to identify duplicates. Further analysis included calculating multiple occurrences of the same name and date of birth in the duplicates file as well as a county and ZIP code crosstabulation.

Dispatch researchers Jim Hunter and Linda Deitch contributed to this story.


jcraig@dispatch.com

Box Story: Fact or fiction?

* With campaigns at a fever pitch, the rhetoric in speeches and commercials is clouded by misstatements and falsehoods. See how you can cut through the baloney on page A8. To find out how your views compare with those of the people running for president, U.S. Senate and U.S. House of Representatives, go to www.dispatch.com and click on the Candidate-Match icon.

GRAPHIC: Photo, Graphic with Map, (1) LISA MARIE MILLER DISPATCH PHOTOS/, Drusanne Shaulis, left, and Sally Burk are two of the workers at the Franklin, County Board of Elections getting ready for Election Day./, (2) Graphic with Map

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Franklin County

Election Fraud Cases Under Review

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Hundreds of cases of suspected election fraud are under review in Franklin County.

"I was surprised by the number," county prosecutor Ron O'Brien told 10TV.

Stacks of voter registration applications are now being scrutinized. Prosecutor O'Brien's office is reviewing them for irregularities after the applications raised red flags with the Board of Elections.

"What causes some of this to happen is that people are being paid to register new voters," O'Brien said of the practice of paying people by the application.

One application being examined was signed in the name of a man who passed away in February. Another 25 applications show different addresses for the same man.

Six of the suspicious forms were submitted by representatives of the Columbus Urban League, while 62 others came from ACORN, the Association of Community Organizations for Reform Now.

Both groups say they've fired people suspected of fraud.

Kevin Eugene Dooley, involved in Project Vote as an employee or agent of ACORN, was indicted by the grand jury earlier this year for two felony election offenses -- false election registration, and submitting false election signatures to the Board of Elections. Dooley is alleged to have falsified and forged a new voter registration card that was submitted to the BOE.

And you might recognize the name of Nuradin Abdi. He's a native of Somalia charged with plotting to blow up a Columbus mall.

"As far as board of elections is concerned, Abdi is a registered voter," board of elections director Matt Damschroeder said.

We now know according to federal officials, he's an illegal alien. That would mean he can't legally vote. But the Franklin County Board of Elections had no way of checking that when they sent him a voter registration card early this year.

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The board takes a person's word, that they're a U.S. citizen.

"Right now, we're in between not having a way to full check," Damschroeder said.

Elections workers do check new signatures with old records -- and watch for voter registration confirmation cards that are returned in the mail: Red flags for election fraud.

"Anyone responsible will be prosecuted," O'Brien said.

Election fraud is a felony.



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Source: [News & Business](#) > [News](#) > [News, Most Recent 90 Days \(English, Full Text\)](#) 

Terms: [publication \(plain dealer\)](#) and ["entire neighborhood"](#) and [absentee](#) ([Edit Search](#))

Plain Dealer (Cleveland) September 23, 2004 Thursday

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Plain Dealer (Cleveland)

September 23, 2004 Thursday
Sports Final Edition; All Editions

SECTION: NATIONAL; Pg. A1

LENGTH: 580 words

HEADLINE: Dead man on voter rolls sparks inquiry

BYLINE: Michael Scott, Plain Dealer Reporter

BODY:

Painesville — At least one Lake County voter would have made quite a comeback to cast a ballot Nov. 2.

He has been dead for more than two decades, elections officials said.

In a seemingly lesser miracle of wayward democracy, an elderly nursing home resident who only scrawls a shaky "X" when signing official documents suddenly regained a firm, crisp cursive signature when she registered.

Both the dead man and the elderly woman were signed up by voter registration advocacy groups, Lake County elections officials said.

"Those were not their signatures," Lake elections board Director Jan Clair said Wednesday. "Now, we're talking about election fraud here, and we're going to take some of these cases to the prosecutor."

Clair said the veracity of dozens of registration cards and maybe hundreds of **absentee** ballot requests are being investigated by the Lake County board in an election year with possibly record-setting registration efforts. The 12,000 new registrations in Lake County this year more than double the last two years combined, she said.

"Let's just say there are a lot of voter advocacy groups out there this year with a number of zealous participants who maybe don't understand the law regarding this type of activity," Clair said.

"We're not going to be allowing anyone to intrude on the integrity of democracy," Clair said.

She said that the registration of the deceased man was filed by the National Voter Fund, the registration arm of the NAACP, and the woman in the nursing home was registered by the group Americans Coming Together, known in this state as ACT Ohio.

She said ACT Ohio had been to two Lake County nursing homes and a number of registrations were now in question.

A spokesman for the National Voter Fund could not be reached. Its Web site, www.naacpnvf.org, says it is a nonpartisan effort to increase participation of the African-American voter.

Jess Goode, state communications director for ACT Ohio, said the Lake County allegations would turn out to be nothing.

"We honestly believe that there is nothing to this and that it was based on confusion and miscommunication," Goode said. "We have tough, professional standards and . . . a well-trained staff.

"Our goal is to make sure more Ohioans are able to vote legitimately."

ACT is a partisan group formed with the specific intent to oust President Bush from office and promote Democrats on all ballots, according to its Web site, www.actforvictory.org.

Groups like ACT are known as 527 organizations because of the number of the section of the tax code that governs political committees. Published reports have said that the organizations have raised nearly \$184 million since the end of 2002 to use for get-out-the-vote operations, political advertising and contributions to state and local candidates.

Clair said she is also investigating a potentially fraudulent registration effort by a political candidate, whom she would not name unless the case gets referred to Lake County Prosecutor Charles Coulson.

None of the cases has been turned over to Coulson yet, although board members Wednesday gave Clair the OK to pursue the cases criminally.

There are other apparent irregularities in Lake County, like dozens of people on one street who filed for **absentee** ballots.

"Like one **entire neighborhood** that says it's going to be out of town on Election Day?" Clair asked. "That seems more than a little strange, so we're going out to have a talk with some people."

To reach this Plain Dealer reporter: mscott@plained.com, 440-602-4780

LOAD-DATE: September 24, 2004

Source: [News & Business](#) > [News](#) > [News, Most Recent 90 Days \(English, Full Text\)](#) 


Terms: [publication \(plain dealer\)](#) and ["entire neighborhood"](#) and [absentee](#) ([Edit Search](#))

View: Full

Date/Time: Saturday, October 30, 2004 - 12:48 PM EDT

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Source: [News & Business](#) > [News](#) > [News, Most Recent 90 Days \(English, Full Text\)](#) 

Terms: "dozens of summit registration" ([Edit Search](#))

Akron Beacon Journal (Ohio) August 25, 2004 Wednesday 4X EDITION

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Akron Beacon Journal (Ohio)

August 25, 2004 Wednesday 4X EDITION

SECTION: B; Pg. 1

LENGTH: 675 words

HEADLINE: Prosecutor to probe voter fraud;

Dozens of Summit registration cards have forged signatures, fake addresses

BYLINE: By Lisa A. Abraham; Beacon Journal staff writer

BODY:

Not one of the approximately 50 voter registration cards recently sent to the Summit County Board of Elections has turned out to be legitimate.

Election workers still have a few more cards to check. But so far they have found mostly forged signatures and addresses that are nonexistent. Three of the forms were for voters who already are legally registered to vote, Board of Elections Director Bryan Williams said Tuesday.

While voters often submit new registration cards even though they already are properly registered to vote, in these three instances, the voters in question have told the board of elections that they did not fill out or sign the cards, he said.

After hearing details about the cards, the Summit County Board of Elections voted unanimously to ask the county prosecutor and sheriff to investigate.

The cards were mailed to the board by the AFL-CIO office in Cleveland, which is part of a larger voter registration drive effort in Cuyahoga County. Labor federation officials said they did not know who submitted the cards to their office because they are getting so many from so many different sources.

Staffers there merely forwarded them to Summit County, because there were Akron addresses on the cards.

While the vote to ask for an investigation was unanimous, Democratic board member Wayne Jones said he believed too much was being made of the cards. He said he doesn't believe there was any "grand scheme" to double-register voters in the county.

Williams said last week that he was concerned someone could be trying to cast two votes under one person's name.

"As far as that dual registration, that doesn't happen in this county," Jones said.

Jones also noted that the AFL-CIO office likely submitted many other legitimate registration cards, and Williams agreed that the office probably had.

Summit workers are sending confirmation cards to all the voters at the addresses listed on cards in the packet forwarded by the AFL-CIO. Most have been returned. So far, none has been valid, Williams said.

Large voter registration drives, like the one the AFL-CIO is involved in, are taking place throughout the state because of the Nov. 2 presidential election. The labor federation has endorsed Democratic candidate Sen. John Kerry of Massachusetts for president.

Board member Alex Arshinkoff, a Republican, agreed that duplicate cards happen all the time when voters forget they already are registered and register again. However, he said, those cards don't have forged signatures.

"Duplicate registrations and forged signatures -- that's illegal," Arshinkoff said.

Board member Joe Hutchinson, also a Republican, said he has been on the board of elections since 1990, and he could not recall a time when such a large number of fraudulent cards was submitted together.

In other action, the board certified nominating petitions for candidates, issues and liquor options on the Nov. 2 ballot.

Those candidates and issues that the board did not approve because of problems with the petitions are:

- * Babette Bibey-Sias, for New Franklin Village council at large.

- * Liquor options in precincts Akron 3-H, 3-M, 5-A, 5-H, and 5-K pertaining to the sale of beer; Cuyahoga Falls 3-C, 3-G; Tallmadge 1-C, for both the Firehouse Grille and Pub and the Seven Grains Natural Market.

A liquor question in Akron precinct 3-F will require a decision from the Ohio secretary of state. The board's vote was split 2-2, with members Jones and Hutchinson voting in favor of approving the petitions, and Arshinkoff and member Russ Pry, voting against the petitions.

At issue is whether the petitions properly stated that the question was for "Akron 3-F" and not simply "3-F." There are other cities in Summit County that have precincts 3-F.

The secretary of state's office breaks tie votes from the board.

A similar petition problem in Akron 5-K was approved by a 3-1 vote, because there is no other precinct 5-K in the county.

Lisa A. Abraham can be reached at 330-996-3737 or labraham@thebeaconjournal.com

LOAD-DATE: August 25, 2004


Source: [News & Business > News > News, Most Recent 90 Days \(English, Full Text\)](#) 

Terms: "dozens of summit registration" ([Edit Search](#))


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Terms: "voter cards are piling up" ([Edit Search](#))

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Akron Beacon Journal (Ohio) September 29, 2004 Wednesday

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Akron Beacon Journal (Ohio)

September 29, 2004 Wednesday

LENGTH: 1055 words

HEADLINE: Suspicious **voter cards are piling up;**
Huge Ohio registration effort brings new voters, problems

BYLINE: By Lisa A. Abraham; Beacon Journal staff writer

BODY:

As voter registration cards continue to pour into boards of elections across Ohio, instances of alleged voter registration fraud are growing.

In Summit County, suspected fraudulent voter registration cards continue to trickle in on top of the more than 800 already under scrutiny, according to Board of Elections Deputy Director John Schmidt.

The county sheriff, the state Bureau of Criminal Identification and Investigation, and the Ohio attorney general are investigating the cards received by Summit County.

As of Tuesday, the office had a stack of 3,000 voter registration cards that still had to be verified, Schmidt said.

Monday is the state's deadline for voter registration for the Nov. 2 election.

With Ohio's position as a must-win state in the presidential election, canvassers have been conducting an unprecedented voter-registration effort that is expected to result in as many as 300,000 new registered voters.

But the glut of registration cards has brought problems.

In Mahoning County, Elections Director Michael Sciortino said he has flagged 48 voter registration cards that were part of a group of about 325 submitted by the NAACP in Cleveland.

Sciortino said he will wait until after the Oct. 4 registration cutoff to present them to his board and forward them to the county prosecutor for investigation.

The number, he said, is high even for a presidential election year. Sciortino couldn't recall any problem registrations in 2000, but noted that voter registration in general has far exceeded 2000 totals.

Since January, Mahoning County has registered about 12,500 new voters, with about 1,000 registration cards waiting to be verified and more coming in daily.

Similar handwriting

Sciortino said the registration cards originated from the Cuyahoga County Board of Elections. Many appeared to be in the same handwriting, and as his staff has attempted to verify them, they have been told repeatedly, "I didn't sign that card," he said.

Carlo LoParo, spokesman for Ohio Secretary of State J. Kenneth Blackwell, said his office does not serve as a clearinghouse for possible voter registration fraud, so the problems they know of are ones that have received a lot of media attention, like Summit and Lake counties.

In Lake County, elections officials found more than 100 questionable voter registration forms and absentee ballot applications, including an attempt to register at least one deceased person to vote, said Linda Hlebak, deputy director of the Lake County Board of Elections.

"We have had some trouble," she said, adding that the investigation has been turned over to the Lake County prosecutor.

She said the Lake board sends out postcards to confirm registrations. When the cards start coming back as undeliverable due to nonexistent addresses, it's an indication that there are problems, Hlebak said.

LoParo said the county sheriff or prosecutor is the appropriate agency to investigate cases of suspected fraud.

Increased vigilance

In this political season, when voter registration campaigns are working at a record pace, LoParo said boards of elections have had to be increasingly vigilant.

"There are laws established to deal with election violations or voter fraud. They will be enforced this year... We take voter fraud very seriously," he said.

Even less populated counties have had problems.

Portage County Elections Director Lois Enlow said her office has about a dozen suspected fraudulent registration cards her board is expected to hand over to its county prosecutor.

Some in the group actually were forwarded to Portage County from officials in Summit County and the Secretary of State's office after the addresses on the cards were determined to be in Portage County, she said.

"We're not handwriting experts, but we can see that that one looks an awful lot like this one," she said.

Enlow said her office rarely has problems, so the dozen questionable registration cards are unusual. "I don't recall having even that many," she said.

Since before the March primary election, problems have been noted in counties including Cuyahoga, Franklin, and Trumbull.

In Canton, Stark County Elections Director Jeff Matthews said he's had about four questionable registration cards, but the problem is not as widespread as other areas.

A bigger problem has been the numerous duplicate registration cards that have been submitted for voters who already are registered legally.

Often when a canvasser approaches, a voter will simply register again, and sometimes, again, he said.

"People just keep filling out the forms. We're encountering more as we're working through our backlog," he said.

"I've been here 18 years and I've never seen such a high volume of registrations come in so quickly," said Susan Strasser, director of the Medina County Board of Elections.

Her office hasn't had any problems so far, but she's been watching for it because of problems in other counties.

"That's so hard to police," she said.

Strasser said her staff can compare handwriting on signatures on registration cards, but similar patterns may only be detected if the cards arrive in the same batch.

"We're really keeping an eye out for that. We're scrutinizing each signature. But it can come in a week later," she said.

Plus, she said fictitious addresses may be easy to discover, but fictitious voters at real addresses are found only if the person actually living at the residence bothers to call and alert the elections board about the situation.

If the actual resident receives a confirmation card with another person's name on it and tosses it in the trash, that fictitious voter could get registered.


"I don't know how you police something like that," Strasser said. "Fraud can be done anywhere."

Stephen Brooks, associate director of the Bliss Institute for Applied Politics at the University of Akron, said the concern that the election may be turned by illegally registered voters is unlikely.

"The boards of elections are very competent and their systems are designed to prevent those people from voting... They are designed to prevent illegal voting and to promote legal voting and in general they do a relatively good job," he said.

Lisa A. Abraham can be reached at 330-996-3737 or labraham@thebeaconjournal.com

LOAD-DATE: September 29, 2004

Source: [News & Business](#) > [News](#) > [News, Most Recent 90 Days \(English, Full Text\)](#) 

Terms: "voter cards are piling up" ([Edit Search](#))

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Terms: "kym cason" ([Edit Search](#))

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October 12, 2004, Tuesday, BC cycle The Associated Press State & Local Wire

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Associated Press

October 12, 2004, Tuesday, BC cycle

SECTION: Political News

LENGTH: 214 words

HEADLINE: Investigation reveals potentially fraudulent voter forms

DATETIME: DENVER

BODY:

A review of voter registration forms in five counties has revealed hundreds of potentially fraudulent forms.

KUSA-TV found that 719 forms in Denver, Douglas, Adams, Boulder and Lake counties that have the wrong names, social security numbers and dates of births for voters, many of them turned in by voter registration drives which pay their workers based on the number of people they sign up.

Some were found to be completely made up and other forms belong to real voters but have a few facts, like their precinct, changed - a switch that could prevent the voters from casting regular ballots on Election Day.


"Everyone here at the commission has never seen anything like this. In the state we've never seen anything like this before," said Karon Hatchett, Denver clerk and recorder.

Kym Cason admitted to signing up three of her friends to vote 40 times to help her boyfriend, who earned \$2 for each voter he signed up for the Association of Community Organizations for Reform Now. She said she forged their signatures and filled out their information to the best of her knowledge.

She also signed herself up to vote 25 times.

"I was just helping out downtown. Everybody needs an extra dollar here now and then to make their quota for the day," she said

LOAD-DATE: October 13, 2004

Source: [News & Business](#) > [News](#) > News, Most Recent 90 Days (English, Full Text) 

Terms: publication (washington times) and "vote 35 times" ([Edit Search](#))

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The Washington Times October 14, 2004 Thursday

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The **Washington Times**

October 14, 2004 Thursday

SECTION: PAGE ONE; Pg. A01

LENGTH: 1158 words

HEADLINE: Colorado to tackle voter-fraud fears

BYLINE: By Valerie Richardson, THE WASHINGTON TIMES

BODY:

Multiple registrations reported

Colorado lawmakers yesterday sought to ease concerns about the integrity of the state election process, despite growing accusations of fraud amid an overwhelming flood of new voter registrations.

Republican Gov. Bill Owens said yesterday, "I am extremely concerned about the widespread allegations of serious and sustained criminal activity surrounding voter registration in Colorado."

Earlier yesterday, he told local television station KUSA-TV, the local NBC affiliate, "Clearly, there were some people trying to cheat the system."

Colorado's status as a battleground state in the tight presidential race has turned the state into a magnet for voter-registration efforts, pushing the number of new registrations to more than 100,000 in this state of 4.3 million.

With the voter drives has come a surge in fraud accusations. Some registration drives pay their workers \$2 per application, which gives them a financial incentive to cheat by forging signatures or registering the same voter multiple times.

In one blatant example, Gerald Obi told KUSA that he had registered to vote "about 35 times" after coming under pressure from registration gatherers.

In another case, the same signature was affixed to 10 applications.

Secretary of State Donetta Davidson, who has come under fire in the past week over reports of fraud, took a swing at Attorney General Ken Salazar, saying his office had failed to keep her posted on its investigations.

Mrs. Davidson said she turned in several hundred cases of fraud accusations to his office in April, but had heard nothing since then.

"I have been kept out of the loop, but I have been the one held responsible," said Mrs. Davidson at a press conference yesterday.

Ken Lane, spokesman for Mr. Salazar, said the attorney general's office had been investigating the cases, but that "these investigations take time."

The office has filed charges against one voter-registration worker, accusing him of forging about 50 applications.

Mr. Owens yesterday called on Mr. Salazar and others "to place the highest priority on attacking potential voter fraud."

"With new allegations arising on virtually a daily basis, it is essential that all parties involved - and particularly the attorney general and district attorneys - act decisively and rapidly to root out fraud and prosecute it to the fullest extent of the law," the governor said.

The role of politics in the registration surge also has become a topic of speculation. Mr. Owens and Mrs. Davidson are both Republicans, while Mr. Salazar, a Democrat, is running in a tight race for the U.S. Senate against Republican Pete Coors.

A number of the voter-registration groups tilt politically to the left, such as the Colorado Progressive Coalition and the Association of Community Organizations for Reform Now (ACORN), which describes itself as "community organization of low- and moderate-income families" that works closely with labor unions.

Jim Fleischmann, ACORN Western regional director, said he was cooperating with Denver authorities to track down several hundred fraudulent applications collected by the organization, but he downplayed the severity of the problem.

"Registration fraud is different than voter fraud. Just because you register someone 35 times doesn't mean they get to **vote 35 times**. They can only vote once," he said. "The local press is having a feeding frenzy on this."

Betty Ann Habig, a Centennial council member who has been volunteering in the busy Arapahoe County Clerk and Recorder's office, says she is seeing a partisan tilt to the new registrants, coming from about 20 groups, in her county - a traditional Republican stronghold.

"I'm seeing very few Republicans," she said. "It's almost a 50/50 split so far between Democratic and unaffiliated voters."

"Is there a concerted effort to perpetuate fraud? No," she said. "But you have to remember, these folks are getting paid by the piece."

Mrs. Davidson made headlines earlier this week when she announced that polling places would accept provisional ballots. The rule allows Coloradans who say they registered to vote but whose names do not appear on the rolls to cast ballots as long as they swear an oath and produce identification. Authorities will determine the voter's eligibility after the election.

The decision came after county clerks reported receiving many applications that lacked supporting identification. Another problem was tardiness, with some clerks saying they received packages of applications that were dated in June or July, but were received after the Oct. 4 deadline.

Mrs. Davidson said she would hold a meeting with county clerks and district attorneys on

Saturday to grapple with voter-fraud issues.

The problem lies not with would-be voters, but with disorganized voter-registration organizations, said Davidson spokeswoman Dana Williams.

The fear is that some voter-registration workers might have signed up voters but then failed to turn in their applications to election clerks. If necessary, she said she would call for a grand-jury investigation.

The secretary of state "doesn't want voters to be turned away when they registered in good faith," Miss Williams said.

The Colorado fracas comes as numerous other swing states are fighting over voter registration and fraud accusations.

*The swing states of Ohio, Florida, Missouri and Michigan already face Democrat and liberal-inspired lawsuits seeking to extend provisional ballots to all who request them, even if the voter is not in his proper precinct, as laws in 26 states and the District of Columbia require.

*Elections officials in Nevada have rebuffed a bid by a former head of the state Republican Party to purge about 17,000 Democrats from the voter rolls as inactive. Nevada law requires that voters go on "inactive status" if they move and don't update their addresses within 30 days of receiving notice to do so.


But Clark County Registrar of Voters Larry Lomax rejected the move on Tuesday, saying Dan Burdish could only challenge voters in his precinct, and then only if he has personal knowledge that they are inactive.

*Milwaukee County Executive Scott Walker refused a request from Mayor Tom Barrett, a state co-chairman of Mr. Kerry's campaign, to have more than 900,000 ballots printed, citing concerns about voter fraud and "serious questions" about the need for that many ballots.

Milwaukee reported having 382,000 registered voters in September and a total of 423,811 residents old enough to vote. Mr. Walker said "chaos" could occur at understaffed polling places where voters could grab ballots.

*Several Democrat-leaning unions sued Florida elections officials on Tuesday, arguing that thousands of voters have been disenfranchised by the rejection of their incomplete voter registration forms. The suit accuses Secretary of State Glenda Hood of violating federal law for telling the state's 67 elections supervisors that they should reject incomplete voter-registration forms.

LOAD-DATE: October 14, 2004

Source: [News & Business](#) > [News](#) > [News, Most Recent 90 Days \(English, Full Text\)](#) 

Terms: [publication \(washington times\)](#) and ["vote 35 times"](#) ([Edit Search](#))

View: Full

Date/Time: Saturday, October 30, 2004 - 12:05 PM EDT

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I-Team uncovers partisan tactics in Colorado voter registration drives

Deborah Sherman (I-Team Reporter)

Created: 10/20/2004 4:08 PM MDT - Updated: 10/25/2004 11:09 AM MDT



LAKEWOOD - "I thought it was very questionable what they were doing," said Frank Taylor, a former registration worker. Taylor registered some 75 new voters in June for the group "Choose 2 Vote."

But when he turned in the forms to the company based in Lakewood, he was only paid for a few of them. "They wouldn't pay us if they were Republican," said Taylor. Workers were paid \$3 per application if the voter registered Democrat, unaffiliated or independent, but nothing for Republican.

Taylor says he finally quit because he wasn't getting paid for at least half of the forms he was submitting to "Choose 2 Vote."

Company spokesman Derrick Lee admitted to 9NEWS he was only interested in registering Democrats.

"Yeah, what do you want me to say? It's true," said Lee. "The Republicans weren't paying money for voter registrations."

Lee would not say which Democrats funded his voter registration drive.

"I have folks who were willing to pay me to do it," said Lee.

While the selective payments are not illegal, the Colorado Republican Chairman says it's also not ethical.

"By not making it an even playing field for all registrations, like we do it, you're almost encouraging them not to do it even-handedly," said Ted Halaby, GOP Chairman. "What that does is encourages fraud," he said.

In fact, Arapahoe County received so many questionable registration forms from "Choose 2 Vote" in April, it turned them over to the Secretary of State for investigation.

"We are concerned that some of these applications, which have been filed in Arapahoe County, may involve voter registration fraud," wrote Nancy Doty, Arapahoe County Clerk to Donetta Davidson.

In August, "Choose 2 Vote" worker John McCarthy was charged with forgery and procuring false registrations for nearly 50 voters.

All of the bogus registrations had parties listed as Democrat or Independent.

The Colorado Republican party said it does not pay workers to register voters because they're all volunteers. Halaby also said they sign up any party and submit the applications to county election offices.

Halaby is concerned about GOP forms collected by "Choose 2 Vote."

"What this does is encourages them to dump the Republican registrations because they don't get paid for them," said Halaby.

But Lee says every application that was filled out was turned into election offices.

"We got voter registrations from Republicans, Libertarians, Greens, we turn them all in, you have to," said Lee. "We're not like other voter registration (groups) that tear up voter registrations that we don't get paid for."


Lee was referring to a case in Las Vegas last week when "Voters Outreach of America" was reported to have trashed forms filled out by Democrats because the group only wanted to sign up Republicans.

The Colorado Democratic Party said it is not familiar with "Choose 2 Vote." Spokesman Steve Haro called this a "non story" because it is not illegal.

"Everyone was doing it," said Haro, "including Republicans."

Haro also says there is no proof that Republican registration forms were not turned into election offices in Colorado.

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Terms: "florida prosecutors asked to probe" ([Edit Search](#))

The Associated Press October 7, 2004, Thursday, BC cycle

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October 7, 2004, Thursday, BC cycle

SECTION: Political News

LENGTH: 315 words

HEADLINE: Florida prosecutors asked to probe possible voter fraud

BYLINE: By BRENDAN FARRINGTON, Associated Press Writer

DATELINE: TALLAHASSEE, Fla.

BODY:

Elections officials asked prosecutors Thursday to investigate possible voter fraud involving 25 registration forms with apparently bogus addresses, including some that match a public park, a parking lot and a utilities building.

Two of the forms were filled out by individuals at the Duval County elections office and 23 were submitted by people who registered voters independently. Officials didn't immediately know who turned in the independent registrations, said Erin Moody, a spokeswoman for the elections office.

Moody said the 25 forms were turned over to the state attorney's office in Jacksonville. State Attorney Harry Shorstein indicated late Thursday that he hadn't yet seen the forms.

The disclosure is the latest wrinkle as the state tries to avoid problems reminiscent of the 2000 presidential race in which President Bush defeated Al Gore by 537 votes. The disputed election involved accusations that votes weren't properly counted and people were wrongly removed from election rolls.


Duval County had already registered the 25 voters before someone whom election officials declined to identify tipped them to the suspicious information. All but three of the individuals registered as Democrats. Two chose no party and one checked Republican.

The Associated Press checked each address and found only one that matched an occupied house. Most of the addresses didn't exist. Residents at the occupied house said they moved in this week and did not know the person registered at the address.

Several Florida counties have discovered problems with voter registration forms turned in by independent groups. Thousands are missing information, meaning thousands of people could find out Nov. 2 that they are unable to vote in the contest between Bush and Democrat John Kerry.

Associated Press reporter Ron Word in Jacksonville contributed to this report.

LOAD-DATE: October 8, 2004

Source: [News & Business > News > News, Most Recent 90 Days \(English, Full Text\)](#) 


Terms: "florida prosecutors asked to probe" ([Edit Search](#))

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Date/Time: Saturday, October 30, 2004 - 4:04 PM EDT

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The Miami Herald August 30, 2004 Monday BR EDITION

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The Miami Herald

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The Miami Herald

August 30, 2004 Monday BR EDITION

SECTION: B; Pg. 1

LENGTH: 985 words

HEADLINE: Snowbirds urged to switch;

Lawyer's initiative aims to turn Democratic snowbirds from New York into Florida voters, even as federal officials have been asked to investigate double-voting in the two states.;
NEW YORK VOTERS

BYLINE: BY ERIKA BOLSTAD; ebolstad@herald.com

BODY:

A Boca Raton lawyer with a 4-year-old grudge against the Electoral College wants to convince New York snowbirds who spend part of the year in Florida to switch their voter registration to the Sunshine State.

Lawrence Caplan's project, "Operation Snowbird," is based on the vagaries of the Electoral College, the formula used to elect American presidents.

His theory: New York hasn't voted Republican in a presidential election since 1984, and the state's 31 Electoral College votes will likely go to John Kerry in November.

But in Florida, a swing state where President Bush won by just 537 votes in 2000, the state's 27 Electoral College votes are still up for grabs. A candidate needs 270 of the 538 Electoral College votes to capture the presidency.

So why shouldn't Democratic retirees who live in both states register to vote in Florida, Caplan reasons, where their votes won't get lost in a sea of other Democratic ballots?

"Obviously, based on 2000, a few hundred extra votes could swing the election," Caplan said in an e-mail. "The system is an anachronism and has no genuine place in electing a president in a democratic nation."

Florida election officials don't just frown on the idea -- they outright disapprove of it.

"While the precise wording may not be incorrect, the intent is definitely irresponsible," said Jenny Nash, a spokeswoman for Florida Secretary of State Glenda Hood. "To be a registered voter in Florida, you have to be a legal resident."

What concerns Hood more, though, is that the state has found that people already are registered -- and even voting -- in both Florida and New York, Nash said. The New York Daily News recently published an investigation that found that an estimated 46,000 people are

registered to vote in both states.

As many as 500 to 1,000 people may have voted in both Florida and New York in the same election over the past several years, including the 2000 election, The Daily News found.

Hood sent a letter on Thursday to the FBI and the U.S. Elections Assistance Commission asking for help investigating the double registrations and urging that they prosecute anyone who committed the felony of voting twice in a single election.

In her letter, Hood specifically refers to a retiree from Staten Island who told The Daily News he voted absentee in Brevard County, but feared he sent in his ballot too late to be counted. So he voted in New York, too.

'DECISIVE ACTION'

"We believe that immediate and decisive action on the federal level is necessary to send a strong message that this type of illegal behavior and manipulation of the electoral franchise will not be tolerated," Hood said in her letter.

It's difficult to catch people who vote in both states, because there's no national cross-referencing of state voter files, and election officials rely on new voters to tell the truth.

When they register to vote, they're signing a pledge that they're not registered anywhere else, that they're not a felon, and that they are Florida residents, said Broward Supervisor of Elections Brenda Snipes.

"You make an assumption that whoever fills out the paperwork and signs the oath is being truthful and honest," Snipes said.

Caplan said he's not encouraging anyone to vote in two places in the same election -- and he warns voters against that on his website, www.operationsnowbird.com.

Caplan, who is registered to vote as an independent in Broward County, said he's just someone who is interested in seeing changes to the Electoral College. And he'd like to see Kerry win.

"I believe that the country is on the wrong track and is desperate for change," he said in an e-mail.

He's been studying the Electoral College for weaknesses since 2000 when he filed a widely publicized lawsuit against Vice President Dick Cheney.

Caplan's suit argued that President Bush and Cheney couldn't accept Texas' 32 electoral votes because the 12th Amendment prohibits electors from casting Electoral College votes for both presidential and vice presidential candidates from their own state. The case worked its way from federal courts in Texas to the Supreme Court, which ended the case by refusing to hear Caplan's appeal.

Operation Snowbird also has its roots in the "Nader trader" concept that was floated in 2000 by left-leaning voters who wanted to vote for Ralph Nader, but who feared a vote for the Green Party candidate would take away votes from Al Gore.

In 2000, Nader voters in Florida agreed to switch votes with Gore voters in a state such as New York. The swing-state voter was supposed to cast a ballot for Gore, giving him votes in a state where every vote was crucial.

The voter in the blow-out state was supposed to cast a ballot for Nader, which would have helped the Green Party's goal of a 5 percent national showing -- as well as comfort the conscience of liberal voters.

LITTLE ATTENTION

So far, Operation Snowbird has only attracted a handful of interest and little attention. Caplan said he expects to begin putting some public relations muscle behind the idea when he returns from a vacation in Scotland this week.


Similar ideas have been pushed in Ohio, a swing state with lax voter registration guidelines, said state Rep. Ron Greenstein, a Democrat who represents several Broward County retirement havens popular with snowbirds.

So far, all the snowbirds are still in New York and haven't made the trek down here, Greenstein said, so it's hard to determine whether there's really any interest.

And how many New Yorkers would want to give up their registration anyway, mused Mitch Ceasar, chairman of the Broward County Democratic Party and a former New Yorker himself.

"I've heard the concept before and I applaud it," Ceasar said. "But I don't think the logistics will be easy. You can move the person out of New York, but you can't take the New Yorker out of the New Yorker."

LOAD-DATE: August 30, 2004

Source: [News & Business](#) > [News](#) > [News, Most Recent 90 Days \(English, Full Text\)](#) 

Terms: "snowbirds urged to switch" ([Edit Search](#))

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Posted on Thu, Oct. 28, 2004

Broward mailing new ballots; Florida GOP warns of disenfranchment

TIM REYNOLDS
Associated Press

MIAMI - Tensions preceding Election Day mounted Thursday, amid claims of voter fraud and intimidation at Florida's early polling locations, promises that lost absentee ballots will reach Broward County citizens in time, and concerns that Republicans will question the authenticity of thousands of votes.

Workers at Broward's elections office prepared 1,000 absentee ballots for overnight shipping to Floridians currently residing in other states, and expected to send up to 14,000 others by Friday to residents who requested them weeks ago. Those must be delivered by Saturday.

Meanwhile, state Republican leaders said they are protecting "the integrity of the process" by compiling a list of voters who they say are improperly registered and should not be allowed to cast ballots Tuesday.

"I presume they will use it as a basis for challenges," said Howard Simon, the executive director of the American Civil Liberties Union in Florida. "And when they're using a list that's very likely inaccurate for challenges, I think we're in for hand-to-hand combat at the precincts."

Indeed, emotions are already high. At a news conference called by Republicans in downtown Miami on Thursday, a man carrying signs supporting both President Bush and Republican Senate candidate Mel Martinez was bumped by members of the Association of Community Organizations for Reform Now, or ACORN.

Republican National Committee chairman Ed Gillespie said he was "disconcerted" by claims that supporters of Democratic presidential candidate John Kerry are clogging early voting locations and attempting to dissuade backers of President Bush from voting.

"I am a little disconcerted by some of the reports I have seen here in Florida of voter intimidation, of Republican and Bush voters standing in line to vote and being harassed by Sen. Kerry's supporters," Gillespie said. "Some folks have been intimidated to the point where they turned away from the lines."

Democrats, meanwhile, dismissed Gillespie's claims as rhetoric and accused Republicans themselves of trying to keep Tuesday's turnout low.

They pointed to a series of 18 announcements made in recent weeks by the Republican National Committee, calling them "empty fraud allegations" designed to steer voters away from the polls.

"It's a pattern. Yet again, we're hearing that the Republican Party is crying fraud," Kerry campaign spokeswoman Christine Anderson said. "This is a very clear strategy on their part to lay the groundwork for Election Day challenges. We have clearly stated that we do not plan to challenge voters on Election Day, and that's a promise they simply can't make."

Republicans are already lodging one challenge, alerting the Florida Department of Law Enforcement on Thursday that 925 convicted felons who've lost voting rights have either already voted or have requested absentee ballots for this election. Party officials said they're concerned that number will rise.

Also, GOP officials acknowledged a list with names of voters who may be improperly registered has been forwarded to officials at the county level. The list will not be used for challenges, said state Republican advisor Mindy Tucker Fletcher, who said the compilation is of addresses where the state GOP sent mail, only to have it returned as undeliverable.

"We have provided information to the various supervisors of elections that we have of folks who are registered to vote and should not vote," said Al Cardenas, the former state Republican chairman. "It's up to these departments of elections

primarily to see to it that it takes place."

More than 2,000 names of Duval County residents appear on the list, and elections supervisor Bill Scheu vowed Thursday that if challenges occur, "we are going to have a procedure that is going to resolve them lawfully, accurately and fairly."

A series of embarrassing problems has already popped up, drawing inevitable comparisons to the 2000 election debacle in the Sunshine State. Republicans displayed voter registration materials filed by a "Howard The F. Duck" of Coconut Creek, whose name does appear on Broward's rolls, county officials said.

One cartoon character sneaking onto a list is a minor glitch compared to the absentee issue.

About 58,000 ballots were mailed on Oct. 7 and 8, and the majority of them apparently either did not arrive at residents' homes or didn't come in a timely fashion.

FDLE officials investigated, finding no criminal activity, and Postal Service spokesman Azeezaly S. Jaffer said workers are handling the absentee ballots properly. Jaffer said allegations saying Broward's mail workers acted any other way "are groundless at best and, in fact, insulting."

"Processing is current. Ballots that have been received have been delivered," Jaffer said.

Snipes said her office has sent 128,000 absentee ballots this year; 72,000 have already been returned, and she expects 40,000 more to be delivered to Broward's election department by Tuesday.

Residents who already requested ballots but haven't seen one are being urged to call the election office so a replacement can be sent by overnight mail. There are concerns, however, that the mailing glitch could create confusion with individuals having two ballots or being forced to file provisional ballots on Election Day.

"Some of these ballots we thought were lost have been received in our office," said Snipes, a Democrat who replaced embattled former supervisor Miriam Oliphant late last year. "I think it was more of a delay than ballots being lost. ... The extent of the problem is not going to be as great as it may appear."


Broward, which has the state's largest Democratic pocket, isn't alone in having absentee-ballot issues. In Palm Beach County, hundreds of members of the Florida Alliance for Retired Americans say they haven't received their absentee paperwork, either.

Other large Florida counties, like Miami-Dade and Pinellas, report no absentee-ballot troubles.


Florida also got more last-minute campaign stops by celebrities Thursday, with Michael Moore ("Fahrenheit 9/11") scheduling an evening rally in Fort Lauderdale and hundreds of Miami-Dade College students being urged to vote by hip-hop mogul Sean "P. Diddy" Combs.

"Even if they're telling that your vote doesn't count, even if they're challenging your right to vote, don't give up," Combs said.

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Terms: [publication \(milwaukee\)](#) and ["marquise blakely"](#) ([Edit Search](#))

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Milwaukee Journal Sentinel (Wisconsin) October 4, 2004 Monday

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Milwaukee Journal Sentinel (Wisconsin)

October 4, 2004 Monday
Final Edition

SECTION: B News; Pg. 1

LENGTH: 681 words

HEADLINE: Registration fraud takes advantage of security rules;
Deputy registrar system, intended for accountability, seen as a loophole

BYLINE: TOM KERTSCHER, tkertscher@journalsentinel.com, Journal Sentinel

BODY:

A program that should make the state's voter registration system more secure might be partly to blame for possible fraud problems that have surfaced in Racine.

Irregularities with voter registration applications appear to be isolated. But because of the way the deputy registrar program works in Wisconsin, the problems may simply be hidden.

In Racine, the district attorney's office is investigating seven voter registration applications filed by Project Vote in the names of people who said the group never contacted them.

The applications had been filed by Project Vote workers who were certified by Racine as deputy registrars. They completed a city clerk's office class on how to register voters and took an oath to work honestly.

In theory, the deputy registrar program makes voter registration more secure because the applications are being filled out by trained workers.

The program also offers the advantage of streamlining for local election officials: They do not have to see proof of identification from the person being registered if the application is filed by a deputy registrar.

But that advantage works, as the experience in Racine illustrates, only if the deputy registrars are reliable.

Fired Project Vote worker Robert **Marquise Blakely** of Milwaukee told the Journal Sentinel last week that he had not met with any of the people whose voter registration applications he signed, an apparent violation of state law. -

Blakely said he signed the applications filled out by other Project Vote workers because they were not deputy registrars as he was. He said he trusted that they had done their work diligently.

Three of the seven Racine applications being investigated by prosecutors were signed by Blakely. He also signed three other applications that the Racine city clerk's office said contained signatures that looked "suspiciously similar."

The city clerk's office learned of the seven applications that had not been authorized by the people named on them only because it contacted the residents after numerous problems surfaced with applications filed by Project Vote.

The clerk's office was not required to check the identities of the people named because the applications were filed by Blakely and three other Project Vote deputy registrars.

Acting Racine City Clerk Carolyn Moskonas revoked the registrar status of the four Project Vote workers and requested the investigation by the district attorney's office. She said she was concerned about the irregularities but emphasized that the deputy registrar generally has worked well for years.

"It's too bad it happened this way," Moskonas said of the problems, "but that doesn't mean this system is bad."

Moskonas also said she believes that some Project Vote workers were motivated by money -- they were paid an hourly salary plus bonuses after meeting a quota -- rather than by voter fraud. She pointed out that many of the problem applications were in the names of people who are already registered to vote.

Moskonas and Kevin Kennedy, executive director of the state Elections Board, said the Racine problems do not indicate evidence that any widespread voter fraud could occur in the Nov. 2 election. The Milwaukee Election Commission has referred 21 "suspicious" voter applications to prosecutors, though what problems they contained are not known.

"The fact that we're identifying it now means these people are not going to be on the list and they're not going to get a ballot," Kennedy said of the registration application problems.

Kennedy also emphasized that problems that have surfaced represent a small fraction of what he estimated are 200,000 voter registration applications filed this year. The volume of applications caused Milwaukee to add a shift of workers for processing, beginning this weekend.

Patrick Curley, chief of staff to Milwaukee Mayor Tom Barrett, said fraud at the polls is "always a concern." He said that because so many voter registration applications are being submitted, and because some are incomplete, new voters should bring identification with them to the polls to ensure that they can vote.

LOAD-DATE: October 20, 2004


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Terms: "prosecutor urged to examine" ([Edit Search](#))

The Kansas City Star September 9, 2004 Thursday 1 EDITION

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THE KANSAS CITY STAR.

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The Kansas City Star

September 9, 2004 Thursday 1 EDITION

SECTION: B; Pg. 3

LENGTH: 386 words

HEADLINE: **Prosecutor urged to examine** reports of double voting

BYLINE: By GREG REEVES; The Kansas City Star

BODY:

Missouri Secretary of State Matt Blunt has asked the Jackson County prosecutor to investigate cases of possible vote fraud reported Sunday in The Kansas City Star.

More than 300 people may have voted twice in the same election in Missouri, The Star reported. The newspaper found three persons who acknowledged voting in both Kansas and Missouri in the same election in 2000 or 2002.

The findings were the result of a newspaper analysis of 3.9 million voter registration records in Missouri and 1.5 million records in Kansas. The statewide databases contain information about past elections.

"The only way to end election fraud is to punish the perpetrators," Blunt said. He said his office, which has no prosecutorial powers, is ready to help local prosecutors.

Jackson County Prosecutor Mike Sanders said he was already aware of issues raised in The Star article and was "working on it" when Blunt's letter arrived. He declined to be more specific.

"If an investigation turns up evidence of voter fraud, this is something (my) office would take very seriously," Sanders said. "The public needs to have confidence that the system's fair, and if someone violates the statutes regulating elections, they will be held accountable."

In Kansas, a spokesman for Secretary of State Ron Thornburgh said Wednesday that Thornburgh would meet today with U.S. Attorney Eric F. Melgren to discuss The Star's findings. Thornburgh said last week he was ready to seek prosecution if vote fraud was established in the examples cited in the article.

Blunt, a Republican who is running for governor, said he had unsuccessfully tried to win legislation requiring voters to present valid photo identification at the polls. Evidence in The Star article, he said, demonstrates "the need to further strengthen our identification requirement."


Some legislators oppose tightening requirements on voter identification at the ballot box

because they fear the action could discourage people from voting.

Election officials in both states hope that an infusion of federal funds from the 2002 Help America Vote Act will help beef up the voter registration databases and make double-voting and other forms of vote fraud more difficult.

To reach Greg Reeves, database editor, call (816) 234-4366 or send e-mail to greeves@kcstar.com

LOAD-DATE: September 9, 2004

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Terms: "voter forms a mess" ([Edit Search](#))

Albuquerque Tribune (New Mexico) August 17, 2004 Tuesday

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Albuquerque Tribune (New Mexico)

August 17, 2004 Tuesday

SECTION: EVENING; Pg. A2

LENGTH: 357 words

HEADLINE: Clerk: **Voter forms 'a mess'**

BYLINE: Shea Andersen SANDERSEN@ABQTRIB.COM / 823-3621

BODY:

Mary Herrera has 15 extra employees in her office who thought their temporary jobs would end in June.

Instead, the Bernalillo County clerk has kept them on, working 40-hour weeks, checking the avalanche of voter registration cards.

They've had lots to check.

The office gets about 1,000 cards per day and as many as 3,000 most Mondays.

However, Herrera estimates she now has 3,000 voter registration cards with some problem or another, which makes them invalid.

"We have a mess here," Herrera said. "I'd rather say it now, so we have time to straighten it out."

She's worried because she knows it will be a close presidential election again this year. (Al Gore won New Mexico by 366 votes in 2000.) She also doesn't want to hear about problem registrations in November.

The stacks of voter registration cards include some with faulty addresses. Or cards with no address. Some have bad signatures. And others have no Social Security numbers.

One stack, about 400 cards deep, is simply undeliverable, she said, returned by the U.S. Postal Service.

By now, New Mexico's status as a swing state is cliché. What it has meant, however, is hordes of private groups trying to sign up new voters in New Mexico.

Sometimes, Herrera said, they make mistakes.

One group that has been at this business awhile is ACORN, the Association of Community Organizations for Reform Now. The nationwide group pays its workers to sign up voters, and they get bonuses for turning in more than 24 cards per day.

But a spokeswoman for ACORN said errors on voter sign-ups come with the territory.

"There's a range of things that go wrong with voter registration cards," said Colombe Leland, a political organizer for ACORN in Albuquerque. "There's room for slippage."

Leland said her group has three full-time verifiers who try to cull faulty voter cards.


But for Herrera, it's a headache and a worry as the election approaches.

"This election may be close," Herrera said. "I don't want anybody saying, 'My vote didn't count.' "


DID YOU SIGN UP?

If you registered to vote but don't receive your voter identification card in two weeks, call the Bernalillo County Clerk's Office at 768-4085.

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Source: [News & Business > News > News, Most Recent 90 Days \(English, Full Text\)](#) 

Terms: "gloria williams" and "registration" ([Edit Search](#))

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Detroit Free Press September 23, 2004 Thursday 2 EDITION

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Detroit Free Press

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Detroit Free Press

September 23, 2004 Thursday 2 EDITION

LENGTH: 680 words

HEADLINE: Campaign workers suspected of fraud;
Voter-**registration** problems probed

BYLINE: BY DAWSON BELL; FREE PRESS STAFF WRITER

BODY:

Overzealous or unscrupulous campaign workers in several Michigan counties are under investigation for voter-**registration** fraud, suspected of attempting to register nonexistent people or forging applications for already-registered voters, election and law enforcement officials said Wednesday.

Officials in Wayne, Oakland, Ingham and Eaton counties have been contacted about the problem, which appears to be an outgrowth of unprecedented efforts by political interest groups to register thousands of new voters before the November election.

State Elections Director Christopher Thomas said he hoped criminal prosecutions would result. Thomas, who has held his post for more than 20 years, said the scale of voter-**registration** drives this year and the irregularities were like nothing he had seen before.

Although there is little likelihood that phony **registrations** could be used to affect the outcome of an election because of safeguards in place, alleged fraud undermines confidence in the system and burdens local elected officials, Thomas said.

"We don't want to give the impression that there are a lot of people who will be able to vote" using a phony **registration**, Thomas said, "but these clerks have enough to do without having to screen thousands of duplicates" and bogus applications.

Ingham County Sheriff's Detective Mark Bowser said an investigation of suspected **registration** fraud has been under way since late August and could be turned over to the county prosecutor by the end of the week.

Bowser said it is unclear how widespread the problems are. He said the investigation has reviewed "a couple thousand questionable **registrations**."

Representatives from two groups whose workers have submitted apparently-fraudulent applications -- the Public Interest Research Group in Michigan (PIRGIM) and Project Vote -- downplayed the issue Wednesday, insisting that it involved only a handful of workers and a

limited number of **registrations**.

David Leland, national director of Project Vote, said fewer than 100 of the thousands of applications his group has collected in Detroit, Pontiac and other four other urban centers had been identified as fraudulent.

But the massive **registration** drives have produced thousands of **registration** applications from voters already on the rolls, city elections officials said.

Detroit Elections Director **Gloria Williams** said her office has been receiving several thousand new **registrations** a day, about half of which were duplicates of people already registered.

Heidi Blankenship, regional director of a PIRGIM voter-**registration** drive designed to generate 20,000 new voters in Ingham and Washtenaw counties, said only three or four workers out of dozens in the project were suspected of wrongdoing. She described them as "young students who didn't realize it was a potential felony."

She said PIRGIM pays workers a flat rate, with bonuses for exceeding **registration** targets. The group attempts to verify a sampling of new **registrations**, she said.

Project Vote's Leland said workers from the offices of the Association of Community Organizations for Reform Now (ACORN), which are collecting **registrations** in Michigan, had produced nearly 70,000 new **registrations** with a very low error rate.

"I feel very happy with the way it is working out, but we will do whatever we can to ensure the integrity of the process," he said.

There have been scattered reports of similar voter-**registration** problems from around the country. The Project Vote office in Ohio fired two workers earlier this year for submitting bogus voter applications.

Ingham County Clerk Mike Bryanton said some of the alleged fraud he had reviewed was "pretty obvious," including names taken out of the phone book and as many as eight people registered from a single apartment address.

Bryanton said he didn't know whether the bad **registrations** violated election law or could be prosecuted under some other statute, such as forgery. But they are a "real pain" for local clerks, he said.

Contact DAWSON BELL at 313-222-6604 or dbell@freepress.com

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United States District Court
District of New Jersey

Democratic National Committee, *et al.*,
Plaintiffs,

v.

Republican National Committee, *et al.*,
Defendants.

Civil Action No. 81-3876

Judge Dickinson R. Debevoise

Supplemental Declaration of Maria Cino

1. My name is Maria Cino. As previously stated, I am the Deputy Chairman of the Republican National Committee.

2. Pursuant to the Court's order, on October 29, I appeared for approximately four hours as the RNC's designated witness to answer questions by the Intervenor's attorney in this case. I answered all questions to the best of my ability.

3. In advance of the deposition, I did extensive investigation within the severe time constraints in preparation to answer questions within the designated topics. In particular, I reviewed the Intervenor's papers served on the RNC at 7:00pm on Wednesday, October 27; read extensive press coverage of events in Ohio relating to voter registration irregularities, the October 20, 2004, press conference held by RNC Chairman Ed Gillespie and Ohio Republican Party Chairman Robert Bennett, and widespread allegations of voter fraud in Ohio and elsewhere by such organizations as the Association of Community Organizations for Reform Now ("ACORN") and Americans Coming Together ("ACT"); conducted extensive interviews of RNC Chairman Ed Gillespie, RNC Political Director Blaise Hazelwood, RNC Regional Political Director David James (who has responsibility for Ohio and Pennsylvania), RNC Chief Counsel

Jill Holtzman-Vogel, RNC Deputy Counsel Caroline Hunter, and RNC Communications Director Jim Dyke. This Declaration is based upon my personal knowledge gained from participation in numerous meetings and conference calls regarding this matter, and the investigation outlined above.

4. On October 19, Chairman Ed Gillespie traveled to Columbus, Ohio for a long-scheduled speech at the Franklin County Ohio Republican dinner, and to meet with the editorial Board of the *Columbus Dispatch*, which was considering which candidate to endorse for President. He also scheduled a meeting with Republican volunteers in Ohio. After the trip was planned, the Ohio Republican Party asked Chairman Gillespie to appear at a press conference the morning of October 20 with ORP Chairman Bennett to express concern about widespread voter registration fraud in Ohio. The evening before the press conference, ORP representatives detailed for Chairman Gillespie the growing evidence of voter registration irregularities, including media reports of crack cocaine being used to pay voter registration volunteers, forgeries of voter registrations, fictitious names, registrations of dead people, and an unprecedented number of undeliverable mailings sent by the ORP and the County Boards of Elections to newly-registered voters.

5. Chairman Gillespie initially expressed skepticism that returned mailings alone indicated potential fraud. Chairman Bennett, who has served on the Cuyahoga County Board of Elections for many years, informed Chairman Gillespie that the normal return rate for mailings to newly-registered voters was less than one percent, whereas in 2004 the return rate exceeded six percent.

6. In advance of the press conference on October 20, RNC Chairman Gillespie and RNC Regional Political Director David James explicitly recall emphasizing to the ORP and Chairman Bennett that Chairman Gillespie could not comment upon or be involved in any plans to challenge suspicious voter registrations. Chairman Gillespie's role in the press conference was accordingly limited to expressing concern about potential voter fraud in an important battle ground state like Ohio. At the press conference, ORP detailed the growing evidence of voter registration irregularities, but announced no plan of action to address the issue. When a reporter asked what would be done about the problem, Chairman Bennett (not Chairman Gillespie) responded that the ORP was considering its options as allowed by law.

7. Based on my personal knowledge and my investigation, it is my firm conviction that the RNC neither initiated nor directed the ORP's current effort to challenge the suspicious voter registrations in Ohio.

8. I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge, information, and belief.

 10/30/04
Maria Cino

WDC99 999207-1.071486.0010

**United State District Court
District of New Jersey**

Democratic National Committee, et al.,

Plaintiffs,

v.

Civil Action No. 81-3876

Republican National Committee, et al.,

Judge Dickinson R. Debevoise

Defendants.

Declaration of Gwen Dillingham

1. My name is Gwen Dillingham. I am the Deputy Director of the Board of Elections in Cuyahoga County, Ohio ("Board"). I have held the position of Deputy Director since March 2004, and previously served as Deputy Director from 1993 to 2000. I have also served as the Acting Director of the Board periodically, over my 14 years as an employee of the Board. As Deputy Director, I am the second-highest ranking staffmember of the Board.

2. I have personal knowledge of the facts and circumstances described herein. I am also familiar with the requirements and procedures of the Ohio Revised Code Title 35, Elections ("Election Code"), including those provisions relating to registration, challenges, and provisional ballots. I am also familiar with Directives of the Secretary of State, which he is authorized by section 3501.05 to issue, that provide additional instructions and procedures to the County Boards of Elections as to the proper methods of conducting elections.

Voter Registration Applications

3. Section 3503.07 of the Election Code provides that anyone who will be 18 years old or more at the next ensuing November election, who is a citizen of the United

States, and who, if he continues to reside in the precinct until the next election, will at that time have fulfilled all of the requirements as to length of residence to qualify him as an elector may register in that precinct, unless otherwise disqualified.

4. No person is entitled to vote who is not registered. *See* Section 3503.06. Nor may any person vote in a precinct in which that person has not resided for at least thirty days prior to the election. *See id.*

5. Section 3503.14 of the Election Code provides that the Secretary of State shall provide the form and content of the registration form.

6. Persons qualified and desiring to register may do so in a variety of ways. One method is to apply by mail or through another person at the office of a Board of Elections. *See* Section 3503.19.

7. Section 3503.19 of the Election Code requires that all registration applications must be received by the Board, or other authorized agency, by no later than the thirtieth day preceding an election (if delivered by hand) and must be postmarked no later than the thirtieth day preceding an election (if delivered by mail) for the person to qualify as an elector eligible to vote at that election.

8. In this election year, the deadline for receiving hand-delivered voter registration applications and for postmarking applications submitted by mail was October 4, 2004.

9. Change of address applications are submitted according to the same procedure and deadlines as are registration applications.

Review of Applications by the Boards of Elections

10. The county Boards of Elections are required by law to review voter registration applications, and they attempt to do so carefully. *See* Section 3503.12. The Cuyahoga County Board of Elections maintains a database of addresses that are known to exist within the County, and the addresses printed on received applications are checked against the database in an attempt to determine as a threshold matter whether the address even exists. Those addresses that cannot be found in the Board's database are checked against the County Auditor's database.

11. If a Board of Elections receives a voter registration application and, after careful review, is satisfied as to the truth of the statements contained therein, the Board of Elections will register the applicant and promptly notify the applicant of the applicant's registration and the precinct in which the applicant is to vote. *See* Section 3503.19.

12. When the Board receives and accepts an apparently valid registration application, the Board sends to the voter at the address listed on the application a voter registration card. The information described in paragraph 11 is included in that mailing.

13. The voter registration card described above is sent to the voter via nonforwardable mail, as is required by Section 3503.19(C) of the Election Code. If the card is returned to the Board as undeliverable, then the registration is "flagged." If the voter thereafter appears at the polling location where he is registered to vote, then the voter's registration is automatically challenged by Board booth workers at the polling location. And if the voter instead appears at any other polling location, then the voter is directed to his proper precinct where he may either complete a 10-U Form and cast a vote (if he is registered in that precinct) or complete a provisional ballot (if he is registered in

the wrong precinct). The Board booth workers that I refer to in this Declaration are hired by the Board, and during the election, are county employees.

14. Voters who submit timely change-of-address applications also receive updated voter registration cards via nonforwardable mail. If the card is returned to the Board as undeliverable, then the registration is "flagged" and handled as described in paragraph 13.

15. In Cuyahoga County, the Board logs all information related to voter registrations in a computer database. All "transactions" with voters -- including receipt of applications, returned mail, changes of address, voting history, etc. -- are logged in the database. The database can be searched by the name of the voter.

16. Any registrations that the Board "flags" for later challenge by Board booth workers on election day are similarly "flagged" in the database, and the reason for such treatment is also included. Such registrations are listed as "INACTIVE" in the database, and the reason (where appropriate) is listed as "UNDELIVERABLE MAIL."

17. As of today, October 30, 2004, there are 180,221 separate registrations in the Cuyahoga County Board of Elections database that are "flagged" for challenge as "INACTIVE," and in my estimation, 90-95% of them are so "flagged" because mail sent by the Board to the voter's last known address was returned to the Board as undeliverable. If any of those 180,221 persons attempt to vote on November 2, 2004, those person's registrations will be challenged by booth workers employed by the Board, as is required by the Election Code.

The Involvement of Outside Groups

18. I understand that several outside interest groups have conducted voter registration drives during the last few months.

19. While voter registration drives are admirable and should be encouraged when performed honestly and legally, many of these interest groups have submitted a large number of applications that, at the very least, raise suspicions and warrant further investigation.

20. For example, an outside interest group known as "Project Vote" has submitted to the Board a large volume of applications that list addresses that the Board cannot locate, utilizing the procedures described in paragraph 10.

21. Moreover, on October 11, 2004, a full week after the registration period had ended, Project Vote hand-delivered to the Board more than 2,800 registration applications. Voters whose registration applications were included in that late Project Vote delivery and who had not previously registered to vote in Ohio will not be registered to vote in the November 2004 election. No votes, including provisional votes, submitted by those voters will be counted. Voters who had previously registered in Ohio and whose applications were included in the late Project Vote delivery will be able to vote in the November 2004 election, but their registrations will not be updated (prior to the election) to reflect any new information contained in the applications, including any change of address information.

Voting Procedures By "Flagged" Voters

22. All properly registered voters will be allowed to vote in Ohio during the November 2, 2004, election.

23. If any of the 180,221 persons whose registrations have been "flagged" for automatic challenge by the Board attempt to vote on election day, however, those persons will be subjected to challenge by Board booth workers, as described above and required by law.

24. Every registered voter is required to vote in the proper precinct corresponding to their residence.

25. If a person whose registration has been "flagged" attempts to vote, Board booth workers will ask that person where he or she resides and will examine the Board's registration records to determine if the Board's records match the person's current residence.

- a. If the address matches, and the voter is in the proper precinct, then the voter will be required to complete, sign, and submit a 10-U Form, confirming that the voter's address has not changed. The voter will then be allowed to vote.
- b. If the address does not match, then the Board booth worker will attempt to locate the proper precinct in which the voter must vote and will direct him there. Consistent with Ohio and federal law, the voter will then be allowed to vote in the proper precinct using a provisional ballot. The provisional ballot will require the voter to provide his or her prior registered address and his or her current address. The voter will also be required to sign the provisional ballot.

26. I am aware of the allegations made by Intervenor in connection with this proceeding as they relate to so-called "challenge lists" prepared by outside groups,

including party committees, for use in the November 2004 election. Based on my many years' experience in monitoring and administering elections, and on my understanding of the allegations made by Intervenor, I do not expect any abnormal disruption of the election of November 2, 2004.

27. Based on my past experience, despite the large numbers of registrations "flagged" for challenge, few of those registrants actually show up to vote on Election Day. I am confident that elections officials in Cuyahoga County can and will efficiently process voters on Election Day despite the large number of registrants "flagged" for challenge.

28. Let me be clear, however, county officials will challenge the registrations of all persons whose registrations have been "flagged."

The "Flagged" Registration of Ebony S. Malone

29. I understand that the Intervenor in this action is Ebony S. Malone, who purports to have lived at one time at 12700 Shaker Boulevard, Apt 417, Cleveland, OH 44120.

30. On October 30, 2004, I searched the Board's electronic database for any and all transactions between Ms. Malone and the Board. I did so by searching the database for the name "Ebony S. Malone." The Board's database lists only one person by that name, and according to the database, she currently resides at 12700 Shaker Boulevard, Apt. 417, Cleveland, OH 44120. Attached as Exhibit 1 is a complete printout of the database entries related to Ms. Malone's registration.

31. According to the database, which I have no reason to suspect is inaccurate:

- a. First, the Board received a registration application for Ms. Malone on October 8, 2003. The application listed her address as 7829 Euclid Avenue, Apt. 503, in Cleveland. The application did not list her address as 7908 Euclid Avenue. The Board accepted the registration and sent Ms. Malone a voter registration card to the listed address.
- b. Second, the Board received a registration application for Ms. Malone on June 4, 2004. The application listed her address as 12700 Shaker Boulevard, Apt. 417, Cleveland, OH 44120. The Board accepted the registration and sent Ms. Malone a voter registration card.
- c. Third, the Board received a registration application for Ms. Malone on August 3, 2004. The application listed her address as 7829 Euclid Avenue, Apt. 503, in Cleveland. The application did not list her address as 7908 Euclid Avenue. The Board accepted the registration and sent Ms. Malone a voter registration card to the listed address.
- d. Fourth, the Board received a registration application for Ms. Malone on August 10, 2004. The application listed her address as 12700 Shaker Boulevard, Apt. 417, Cleveland, OH 44120. The Board accepted the registration and sent Ms. Malone a voter registration card to the listed address.

- e. Fifth, on October 8, 2004, the Board received one of the above-referenced voter registration cards back in the mail, marked as “undeliverable.”
- f. Sixth, following established procedures, the Board listed Ms. Malone’s registration as “INACTIVE” for the reason “UNDELIVERABLE MAIL.” Thus, Ms. Malone’s registration is “flagged” for challenge.

32. Because Ms. Malone’s registration is “flagged” for challenge, if she attempts to vote at the precinct where she currently is registered (the precinct for her Shaker Boulevard address), her registration will be challenged automatically by Board booth workers. And if she attempts to vote in any other precinct, she will be able to vote only by filing a provisional ballot.

33. Because Ms. Malone is properly registered, she will be allowed to vote in the November 2004 election, but only if she appears in the proper precinct and completes a provisional ballot.

34. The automatic challenge to Ms. Malone’s registration by the Board will occur, regardless of whether any outside group attempts to challenge Ms. Malone’s registration. And regardless of any outside group’s attempt to challenge Ms. Malone’s registration, she will be required to follow the procedures described in paragraph 33 in order to cast her vote.

I declare under penalty of perjury that the foregoing is true and correct to best of my belief.



Gwen Dillingham

| | | | | | |
|-----|---|---|---|---|---|
| All | A | I | C | P | F |
|-----|---|---|---|---|---|

| By Name | | By Address | | By Precinct | | By ID | | | | | |
|---|---|----------------------------------|-----------|-------------|-----|--------------|-----|-------|------|-----|----|
| Enter full or partial name | | | | | | | | | | | |
| Last: MALONE | | CITY: | | | | Locate | | | | | |
| First: EBONY | | POB: | | | | | | | | | |
| <input type="checkbox"/> Alt/Prior Name | | <input type="checkbox"/> Soundex | | DOB: / / | | XXXXXXXXXXXX | | | | | |
| # | S | P | LAST NAME | FIRST NAME | INT | DOB | POB | HOUSE | FRAC | PRE | ST |
| 1 | A | | MALONE | EBONY | L | 02/04/1985 | | 9209 | | | FD |
| 2 | A | | MALONE | EBONY | R | 09/23/1981 | | 4726 | | | OS |
| 3 | I | | MALONE | EBONY | S | 05/01/1984 | | 12700 | | | SH |

Select

Cancel

| # | voter_trar | field | before | after | trans_date | login |
|----|------------|----------------------|---------------------|--------------------|----------------------|-----------|
| 1 | 9763947 | LAST TRANS DATE | Sep 13 2004 2:36AM | Oct 4 2004 12:00AM | 10/8/2004 3:13:29 PM | 80E\bjf\w |
| 2 | 9763947 | REASON | | UNDELIVERABLE MAIL | 10/8/2004 3:13:29 PM | 80E\bjf\w |
| 3 | 9763947 | STATUS | A | I | 10/8/2004 3:13:29 PM | 80E\bjf\w |
| 4 | 9337432 | AFFIDAVIT NUMBER | | OH0015315572 | 9/13/2004 2:36:41 AM | dji |
| 5 | 9337432 | LAST TRANS DATE | Aug 27 2004 12:47PM | Sep 13 2004 2:36AM | 9/13/2004 2:36:41 AM | dji |
| 6 | 6930260 | EFFECTIVE_DATE | 10/6/2003 | 5/24/2004 | 6/4/2004 7:46:19 AM | DABRAHAM |
| 7 | 6930260 | PRECINCT | CLEVE-06-A | CLEVE-04-B | 6/4/2004 7:46:19 AM | DABRAHAM |
| 8 | 6930260 | RESIDENCE_CHANGE_DAT | | 5/24/2004 | 6/4/2004 7:46:19 AM | DABRAHAM |
| 9 | 6930260 | SSN4 | | 5846 | 6/4/2004 7:46:19 AM | DABRAHAM |
| 10 | 6930260 | STREETNAME | EUCLID | SHAKER | 6/4/2004 7:46:19 AM | DABRAHAM |
| 11 | 6930260 | STREETNUMBER | 7829 | 12700 | 6/4/2004 7:46:19 AM | DABRAHAM |
| 12 | 6930260 | STREETRANGE_KEY | 58006 | 61137 | 6/4/2004 7:46:19 AM | DABRAHAM |
| 13 | 6930260 | STREETTYPE | AVE | BLVD | 6/4/2004 7:46:19 AM | DABRAHAM |
| 14 | 6930260 | TELE_NUMBER | 4343 | 8062 | 6/4/2004 7:46:19 AM | DABRAHAM |
| 15 | 6930260 | TELE_PREFIX | 253 | 881 | 6/4/2004 7:46:19 AM | DABRAHAM |
| 16 | 6930260 | UNIT | #503 | 417 | 6/4/2004 7:46:19 AM | DABRAHAM |
| 17 | 6930260 | XFERDATE | 10/6/2003 | 5/24/2004 | 6/4/2004 7:46:19 AM | DABRAHAM |
| 18 | 6930260 | ZIP | 44103 | 44120 | 6/4/2004 7:46:19 AM | DABRAHAM |

Voter Registration History (2) [v_votreg 0]

| Voter ID | | Districts | Notices | Role | Vote Hist |
|--|--|---|--|--------------------------------------|-----------|
| Mail Ballots | | Poll Place | Signature | Mailing Label | |
| 1970988 | | MALONE | EBONY | S | |
| Current Name Information Date of Birth: 08/10/2004 File Number: 08/03/2004 06/04/2004 10/08/2003 | | State Res: A Precinct: CLEVE-06-A Ward: Q1 Event: VRUP-NOTICE Cancel: <input type="checkbox"/> Date: <input type="text"/> Residence: 7829 Apt / Lot: #503 City / Zip: EUCLID AVE CLEVE 44103 | App Date: 10/06/2003 Exp Date: 10/06/2003 Elig Status: A Note: <input type="text"/> | Registration History | |
| Party: <input type="text"/> Birthdate: 05/01/1984 DL / ID Card: <input type="text"/> SSN: <input type="text"/> Comments: <input type="text"/> 10/14/04: BMCFAUL | | Birthdate: 05/01/1984 Birth Place: CLEVE OH Challenge: <input type="text"/> Date: <input type="text"/> Signature: <input type="text"/> | Phone: 216 253 4343 Race: <input type="text"/> Signed: <input checked="" type="checkbox"/> | INFO VALID FROM 10/08/03 TO 05/23/04 | |

Voter Registration History (2) [v_votreg 0]

| Districts | | Notices | | Role | | Vote Hist | |
|--------------------------|--|---------------------------|--|------------------------|--|--------------------------------|--|
| Mail Ballots | | Poll Place | | Signature | | Mailing Label | |
| Voter ID: 1970988 | | MALONE | | EBONY | | S | |
| State: OH | | County: CLEVELAND | | City: CLEVELAND | | Zip: 44115 | |
| Birth Date: 05/01/1984 | | Birth Place: CLEVELAND OH | | Phone: 216 | | Fax: 0000 | |
| Event: VRUP-NOTICE | | Elig Group: A | | Signature: [Signature] | | Mailing Label: [Mailing Label] | |
| Residence: 12000 | | City: CLEVELAND | | Zip: 44115 | | Phone: 216 | |
| Mail Address: [Redacted] | | City: CLEVELAND | | Zip: 44115 | | Phone: 216 | |
| Comments: [Redacted] | | City: CLEVELAND | | Zip: 44115 | | Phone: 216 | |
| Transaction: 07:46:19 AM | | City: CLEVELAND | | Zip: 44115 | | Phone: 216 | |

Voter Registration History (2) [v_vatreg 0]

| Districts | | Notices | | Role | | Vote Hist | |
|-----------------------|--|-------------------------------------|--|---------------------|--|---------------|--|
| Mail Ballots | | Poll Place | | Signature | | Mailing Label | |
| MALONE | | EBONY | | S | | | |
| City/State: A | | EN Date: 10/06/2003 | | EN Date: 10/06/2003 | | | |
| Event: VRUP-NOTICE | | City/State: A | | | | | |
| Residence: 1029 | | City/Zip: CLEVELAND OH | | | | | |
| Apt/Lot: 503 | | City/Zip: CLEVELAND OH | | | | | |
| Mail Addr: | | | | | | | |
| Phone: 216 881 8062 | | | | | | | |
| Birthdate: 05/01/1984 | | Birth Place: CLEVELAND OH | | | | | |
| Challenge Date: | | | | | | | |
| Signature: | | | | | | | |
| Operator: WIDEWAY | | RFD VALID FROM 10/06/03 TO 10/06/03 | | | | | |

08/10/2004

08/03/2004

06/04/2004

10/08/2003

04:15:43 PM

Voter Registration History (2) [v_volreg 0]



| Districts | | Notices | Role | Vote Hist |
|--------------|-------------|----------------|------------|--|
| Mail Ballots | | Poll Place | Signature | Mailing Label |
| MALONE | | EBONY | S | |
| State Reps | A | Exp Date | 10/06/2003 | |
| Exp Date | 08/10/2004 | 01 | 10/08/2003 | |
| Event | VRUP-NOTICE | Group | A | |
| Cancel | Date | Date | | |
| Residence | 12700 | SHAWER | BLVD | |
| Appt Loc | 107 | City/Zip | CLEVE OH | |
| Mail Addr | | | | Online Registration Information |
| Party | | | | Phone 216 881 8062 |
| Birth Date | 05/01/1984 | Birth Place | CLEVE OH | Sex |
| DL/D Card | | Challenge Date | | Recd |
| SSN | | Alt Email | | Signed <input checked="" type="checkbox"/> |
| Comments | | | | |
| Operator | HIGGINS | Voter ID | 10/30/2004 | 10/30/2004 |

14:15:03 PM

PRIVILEGED AND CONFIDENTIAL

**United States District Court
District of New Jersey**

**Democratic National Committee, *et al.*,
Plaintiffs,**

v.

**Republican National Committee, *et al.*,
Defendants.**

Civil Action No. 81-3876

Judge Dickinson R. Debevoise

DECLARATION OF CAROLINE HUNTER

1. My name is Caroline Hunter. I am Deputy Counsel at the Republican National Committee ("RNC"), 310 First Street, SE, Washington, DC. 20003. I have held this position since February 2002. I had previously served since March 2001 as Associate Counsel. This Declaration is based upon facts within my personal knowledge and ascertained as part of the RNC's ongoing investigation into the issues raised by this legal action.

2. As part of my job duties at the RNC, I work with Chief Counsel Jill Holtzman Vogel to educate RNC officials about the Consent Decree entered by this Court in the above-captioned matter. Ms. Vogel and I also are charged with insuring that the RNC complies fully with both the letter and the spirit of the Consent Decree. Ms. Vogel and I discharge these important duties through the following exemplary activities:

a. we hold regular briefings and educational sessions for all RNC divisions about the Consent Decree, and we held at least one such session per division earlier in 2004, and in March and April 2004 we held a session with Administration, Communications, Political, and the Co-Chair's Office, and also held a smaller, more in-depth session with Communications and Political;

b. we advise state Republican Party committees about the Consent Decree, and we also advise them about the state and federal election laws governing election day activities;

c. we regularly participate in meetings and telephone calls in which the participants discuss voter registration, "get-out-the-vote," poll-watching, and other election day activities, and we provide legal advice, including advice on compliance with the Consent Decree in connection with these activities; and

d. we collectively have advised the leadership of the RNC, including Chairman Ed Gillespie, Deputy Chairman Maria Cino, National Political Director Blaise Hazelwood, and others, that under the Consent Decree the RNC cannot initiate, control, direct, or fund a program of "voter challenges" of the sort being contemplated and undertaken by the Ohio Republican Party.

3. To the best of my knowledge, after due investigation, the RNC is not initiating, controlling, directing, or funding any programs of "voter challenges" as described above, including the effort by the Ohio Republican Party to challenge voter registrations in Ohio as alleged by Intervenors in this matter.

4. Among other documents, the RNC has produced to Intervenors a chain of electronic mail communications (or "email") among representatives of the RNC, the Ohio State Republican Party, and the Bush-Cheney '04 Campaign Committee, designated as RNC 000147-RNC 000171. I have read these emails, which are attached as Exhibit 1 hereto.

5. The emails discuss a list that cross-correlates the universes of newly-registered voters sharing the following characteristics: (a) their post-registration mailings from the Board of Elections of Cuyahoga County, Ohio – not mailings by either the RNC or the Ohio Republican Party -- were returned as “undeliverable”; and (b) their voter registrations were submitted by the organizations Association of Community Organizations for Reform Now (“ACORN”) and America Coming Together (“ACT”). In total, there were 502 returned mailings for ACT and 1068 for ACORN in Cuyahoga County alone. Numerous media reports connect ACORN and ACT to voter registration improprieties.


6. The emails also note the fact that the Board of Elections of Summit County, Ohio, as of October 5, 2004, had received 200 requests for absentee ballots from persons whose post-registration mailings from the county Board of Elections had been returned as undeliverable. One email author concludes that this is “proof that people with questionable registrations are trying to vote absentee” in at least Summit County, Ohio. Another author notes that “A bad registration card can be an accident or fraud. A bad card AND an Absentee Ballot request is a clear case of fraud.” In addition, the emails discuss the desirability of compiling data of this sort in Ohio and in other states, for purposes of ascertaining the questionable and possibly fraudulent voter registration activities of the Democratic Party and its affiliated organizations such as ACORN and ACT. In addition, an email from one representative of the Bush-Cheney '04 Campaign Committee suggests the prospect of initiating “voter challenges” to apparently fraudulent absentee ballots cast by persons whose post-registration mailings from a County Board of Elections have been returned as “undeliverable.”

7. Although representatives of the RNC were involved in the emails discussing the possibility of the challenges described above, the RNC has not initiated any challenges to absentee ballots in Ohio or in any other state.

8. Contrary to the Intervenor's claims in this matter, it is the Democratic Party and its allies that are engaging in polling place intimidation in Ohio, not the RNC. For example, the Democratic National Committee has sent letters to Ohio Republican Party poll-watchers threatening them with criminal prosecution under a "strict enforcement of the law." One such letter is attached as Exhibit 2 hereto. The Cuyahoga County prosecutor, Democrat William D. Mason, has also sent a similar threatening letter to Republican poll-watchers, warning of prosecutions "to the fullest extent of the law." This form letter is attached as Exhibit 3 hereto. Even though these letters purport merely to remind poll-watchers that their activities are subject to legal restrictions, letters of this sort plainly are intended to dissuade poll-watchers from performing valuable services intended to deter voter fraud.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: October 30, 2004


Caroline Hunter

Participants

Chairman Gillespie
Maria Cino
Mike Duncan
Jim Dyke
Tim Griffin
Jill Holtzman Vogel
Caroline Hunter

Blaise Hazelwood - Political

From: cguith@georgewbush.com
Sent: Tuesday, October 05, 2004 6:33 PM
To: Tim Griffin - Research/Communications; Caddy Johnson; Blaise Hazelwood - Political; Terry Nelson
Cc: Shawn Reinschmidt - Research/Communications; Christopher P. McInerney - Research/Communications
Subject: RE: Cuyahoga Returned List

So how best do we proceed?

-----Original Message-----

From: Tim Griffin
Sent: Tuesday, October 05, 2004 6:29 PM
To: Christopher Guith; Caddy Johnson; Blaise Hazelwood; Terry Nelson
Cc: Shawn Reinschmidt - Research/Communications; Christopher P. McInerney - Research/Communications
Subject: Re: Cuyahoga Returned List

Yes agree
Tim Griffin
Research Director and
Deputy Communications Director
Republican National Committee
310 First Street, S.E.
Washington, D.C. 20003
w: (202) 863-8815
f: (202) 863-8744
tgriffin@rnchq.org

-----Original Message-----

From: cguith@georgewbush.com <cguith@georgewbush.com>
To: Tim Griffin - Research/Communications <tgriffin@rnchq.org>; Caddy Johnson <cjohnson@georgewbush.com>; Blaise Hazelwood - Political <bhazelwood@rnchq.org>; Terry Nelson <tnelson@georgewbush.com>
Cc: Shawn Reinschmidt - Research/Communications <SReinschmidt@rnchq.org>; Christopher P. McInerney - Research/Communications <CMcInerney@rnchq.org>
Sent: Tue Oct 05 18:26:07 2004
Subject: RE: Cuyahoga Returned List

I would think we are less worried about "fingerprints" if we have decent evidence that fraudulent ballots are being cast. I think the intent is to take the list and challenge ABs? At that point, isn't it more important to stop ABs that we have a hi certainty of fraud than avoid the hit?

-----Original Message-----

From: Tim Griffin
Sent: Tuesday, October 05, 2004 6:01 PM
To: Christopher Guith; Caddy Johnson; Blaise Hazelwood; Terry Nelson
Cc: Shawn Reinschmidt - Research/Communications; Christopher P.

RNC 000147

McInerney - Research/Communications
Subject: RE: Cuyahoga Returned List

chris mc says this:

Jack Christopher and I have already tasked our IT person with creating a match list between the BoE's return mail list and the AB request list. Jack thought this would be a good idea to have - to reference as part of the larger DenHerder press strategy. We should have the result of this match later tonight.

I can't speak to other states, but if they don't have flagged voter rolls, we run the risk of having GOP fingerprints...

-CM

-----Original Message-----

From: cguith@georgewbush.com
Sent: Tuesday, October 05, 2004 5:45 PM
To: Tim Griffin - Research/Communications; Caddy Johnson; Blaise Hazelwood - Political; Terry Nelson
Cc: Shawn Reinschmiedt - Research/Communications
Subject: RE: Cuyahoga Returned List

Does Chris M know how it worked in OH? Can he reach out to Jack Christopher to get a sense?

-----Original Message-----

From: Tim Griffin
Sent: Tuesday, October 05, 2004 5:34 PM
To: Caddy Johnson; Blaise Hazelwood; Terry Nelson
Cc: Christopher Guith; Shawn Reinschmiedt - Research/Communications
Subject: RE: Cuyahoga Returned List

if you want to compare our mailings to the absentee ballot requested, that might work. not sure how labor intensive it would be.

-----Original Message-----

From: Caddy Johnson
Sent: Tuesday, October 05, 2004 5:01 PM
To: Blaise Hazelwood - Political; Terry Nelson; Tim Griffin - Research/Communications
Cc: cguith@georgewbush.com
Subject: FW: Cuyahoga Returned List

We should do this in all these states - flag the reg returns vs. the AB ballots requested, no?
C

-----Original Message-----

From: Christopher Guith
Sent: Tuesday, October 05, 2004 4:59 PM
To: Caddy Johnson; Robert Paduchik; 'Mike Magan'; Dave DenHerder; Caroline Hunter - Legal
Subject: RE: Cuyahoga Returned List

We can do this in NV, FL, PA, and NM because we have a list to run against the AB requests, and should.

But to my knowledge, OH is the only state that requires the counties to keep a list of "flagged" registrations from bounce backed mailings.

RNC 000148

-----Original Message-----

From: Cuddy Johnson
Sent: Tuesday, October 05, 2004 3:31 PM
To: Robert Paduchik; 'Mike Magan'; Dave DenHerder; Christopher Guith
Subject: RE: Cuyahoga Returned List

We need to be doing this in other states as well -

Guith - advise -

C

=====
Sign up to be a Bush Volunteer! www.georgewbush.com/volunteer
===== Cuddy Johnson National Field Director,
Bush-Cheney '04
work: 703-647-2733
cell: 202-441-4733
fax: 703-647-2995
email: cjohnson@georgewbush.com

-----Original Message-----

From: Robert Paduchik
Sent: Tuesday, October 05, 2004 3:21 PM
To: 'Mike Magan'; Cuddy Johnson; Dave DenHerder; Christopher Guith
Subject: RE: Cuyahoga Returned List

A bad registration card can be an accident or fraud. A bad card AND an Absentee Ballot request is a clear case of fraud.

-----Original Message-----

From: Mike Magan [<mailto:Magan@ohiogop.org>]
Sent: Tuesday, October 05, 2004 3:19 PM
To: Robert Paduchik; Cuddy Johnson; Dave DenHerder; Christopher Guith
Subject: RE: Cuyahoga Returned List

We are doing a larger check on this tonight running the Franklin Co return list against the AB requests. We will have to start doing this in our target counties. I am coordinating with Amanda Walker to see how ORP is coming along with uploading AB requests in the system.

Mike

Michael Magan
Ohio Republican Party
211 South Fifth Street
Columbus, OH 43215
Office: (614)228-2481 ext. 148
Cell: (614)425-6519
Fax: (614)228-1093
magan@ohiogop.org

-----Original Message-----

From: Robert Paduchik [<mailto:bpaduchik@georgewbush.com>]
Sent: Tuesday, October 05, 2004 3:16 PM
To: Cuddy Johnson; Dave DenHerder; Christopher Guith; Mike Magan
Subject: RE: Cuyahoga Returned List
Importance: High

I have just learned that Summit County has recvd 200 AB requests from

205

RNC 000149

Confidential Information -
Subject to Protective Order

"10-U voters" (these are people the BOE mails address confirmation forms to and they're returned as undeliverable). If this is true it is proof that people with questionable registrations are trying to vote absentee.

-----Original Message-----

From: Caddy Johnson
Sent: Tuesday, October 05, 2004 3:05 PM
To: 'SReinschmiedt@rnchq.org'; Dave DenHerder; Robert Paduchik; Christopher Guith; 'Magan@ohiogop.org'; Kevin Madden; 'Mauk@ohiogop.org'
Cc: 'CMcInerney@rnchq.org'; Tim Griffin; Sean Cairncross
Subject: Re: Cuyahoga Returned List

This is goldmine

-----Original Message-----

From: Shawn Reinschmiedt - Research/Communications
<SReinschmiedt@rnchq.org>
To: Dave DenHerder <ddenherder@georgewbush.com>; Caddy Johnson <cjohnson@georgewbush.com>; Robert Paduchik <bpaduchik@georgewbush.com>; Christopher Guith <cguith@georgewbush.com>; Mike Magan (E-mail) <Magan@ohiogop.org>; Kevin Madden <kmadden@georgewbush.com>; Mauk@ohiogop.org <Mauk@ohiogop.org>
CC: Christopher P. McInerney - Research/Communications <CMcInerney@rnchq.org>; Tim Griffin <Tgriffin@rnchq.org>; Sean Cairncross <scairncross@rnchq.org>
Sent: Tue Oct 05 14:51:50 2004
Subject: Cuyahoga Returned List

Received Cuyahoga county returned mailing/inactive CD from McInerney. I extracted from the total returned list (of kick backs from the county's own mailing), the ACT and ACORN #s .

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>
>
>

RNC 000150

Blaise Hazelwood - Political

From: Tim Griffin - Research/Communications
Sent: Tuesday, October 05, 2004 6:35 PM
To: cguith@georgewbush.com; Cuddy Johnson; Blaise Hazelwood - Political; Terry Nelson
Cc: Shawn Reinschmidt - Research/Communications; Christopher P. McInerney - Research/Communications
Subject: RE: Cuyahoga Returned List

i guess we have to make sure we have bodies. it seems like it always comes down to bodies.

why dont you ask your peeps in each state at issue if they have the resources to do this. then, i might can put some resources in the states that are lacking.

-----Original Message-----

From: cguith@georgewbush.com
Sent: Tuesday, October 05, 2004 6:33 PM
To: Tim Griffin - Research/Communications; Cuddy Johnson; Blaise Hazelwood - Political; Terry Nelson
Cc: Shawn Reinschmidt - Research/Communications; Christopher P. McInerney - Research/Communications
Subject: RE: Cuyahoga Returned List

So how best do we proceed?

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From: Tim Griffin
Sent: Tuesday, October 05, 2004 6:29 PM
To: Christopher Guith; Cuddy Johnson; Blaise Hazelwood; Terry Nelson
Cc: Shawn Reinschmidt - Research/Communications; Christopher P. McInerney - Research/Communications
Subject: Re: Cuyahoga Returned List

Yes agree
Tim Griffin
Research Director and
Deputy Communications Director
Republican National Committee
310 First Street, S.E.
Washington, D.C. 20003
w: (202) 863-8815
f: (202) 863-8744
tgriffin@rnchq.org

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To: Tim Griffin - Research/Communications <tgriffin@rnchq.org>; Cuddy Johnson <cjohnson@georgewbush.com>; Blaise Hazelwood - Political <bhazelwood@rnchq.org>; Terry Nelson <tnelson@georgewbush.com>
CC: Shawn Reinschmidt - Research/Communications <SReinschmidt@rnchq.org>; Christopher P. McInerney - Research/Communications <CMcInerney@rnchq.org>
Sent: Tue Oct 05 18:26:07 2004
Subject: RE: Cuyahoga Returned List

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RNC 000151

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To: Christopher Guith; Cuddy Johnson; Blaise Hazelwood; Terry Nelson
Cc: Shawn Reinschmidt - Research/Communications; Christopher P. McInerney - Research/Communications
Subject: RE: Cuyahoga Returned List

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To: Blaise Hazelwood - Political; Terry Nelson; Tim Griffin - Research/Communications
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Subject: FW: Cuyahoga Returned List

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From: Christopher Guith
Sent: Tuesday, October 05, 2004 4:59 PM
To: Cuddy Johnson; Robert Paduchik; 'Mike Magan'; Dave DenHerder; Caroline Hunter - Legal
Subject: RE: Cuyahoga Returned List

RNC 000152

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Michael Magan
Ohio Republican Party
211 South Fifth Street
Columbus, OH 43215
Office: (614)228-2481 ext. 148
Cell: (614)425-6519
Fax: (614)228-1093
magan@ohiogop.org

-----Original Message-----

From: Robert Paduchik [<mailto:bpaduchik@georgewbush.com>]
Sent: Tuesday, October 05, 2004 3:16 PM

RNC 000153

To: Caddy Johnson; Dave DenHerder; Christopher Guith; Mike Magan
Subject: RE: Cuyahoga Returned List
Importance: High

I have just learned that Summit County has recvd 200 AB requests from "10-U voters" (these are people the BOE mails address confirmation forms to and they're returned as undeliverable). If this is true it is proof that people with questionable registrations are trying to vote absentee.

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From: Caddy Johnson
Sent: Tuesday, October 05, 2004 3:05 PM
To: 'SReinschmiedt@rnchq.org'; Dave DenHerder; Robert Paduchik; Christopher Guith; 'Magan@ohiogop.org'; Kevin Madden; 'Mauk@ohiogop.org'
Cc: 'CMcInerney@rnchq.org'; Tim Griffin; Sean Cairncross
Subject: Re: Cuyahoga Returned List

This is goldmine

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RNC 000154

Blaise Hazelwood - Political

From: Tim Griffin - Research/Communications
Sent: Tuesday, October 05, 2004 6:29 PM
To: cguith@georgewbush.com; Cuddy Johnson; Blaise Hazelwood - Political; Terry Nelson
Cc: Shawn Reinschmidt - Research/Communications; Christopher P. McInerney - Research/Communications
Subject: Re: Cuyahoga Returned List

Yes agree
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Research Director and
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Republican National Committee
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Washington, D.C. 20003
w: (202) 863-8815
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RNC 000155

Subject: RE: Cuyahoga Returned List

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Sent: Tuesday, October 05, 2004 5:34 PM
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Subject: FW: Cuyahoga Returned List

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work: 703-647-2733
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email: cjohnson@georgewbush.com

RNC 000156

-----Original Message-----

From: Robert Paduchik
Sent: Tuesday, October 05, 2004 3:21 PM
To: 'Mike Magan'; Caddy Johnson; Dave DenHerder; Christopher Guith
Subject: RE: Cuyahoga Returned List

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Cc: 'CMcInerney@rnchq.org'; Tim Griffin; Sean Cairncross
Subject: Re: Cuyahoga Returned List

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To: Dave DenHerder <ddenherder@georgewbush.com>; Caddy Johnson <cjohnson@georgewbush.com>; Robert Paduchik <bpaduchik@georgewbush.com>; Christopher Guith <cguith@georgewbush.com>; Mike Magan (E-mail) <Magan@ohiogop.org>; Kevin Madden <kmadden@georgewbush.com>; Mauk@ohiogop.org <Mauk@ohiogop.org>
CC: Christopher P. McInerney - Research/Communications

RNC 000157

<CMcInerney@rnchq.org>; Tim Griffin <Tgriffin@rnchq.org>; Sean
Cairncross <scairncross@rnchq.org>
Sent: Tue Oct 05 14:51:50 2004
Subject: Cuyahoga Returned List

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From: cguith@georgewbush.com
Sent: Tuesday, October 05, 2004 6:26 PM
To: Tim Griffin - Research/Communications; Caddy Johnson; Blaise Hazelwood - Political; Terry
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Cc: Shawn Reinschmidt - Research/Communications; Christopher P. McInerney -
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From: cguith@georgewbush.com
Sent: Tuesday, October 05, 2004 5:45 PM

RNC 000158

To: Tim Griffin - Research/Communications; Cuddy Johnson; Blaise Hazelwood - Political; Terry Nelson
Cc: Shawn Reinschmidt - Research/Communications
Subject: RE: Cuyahoga Returned List

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work: 703-647-2733

RNC 000159

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Christopher Guith <cguith@georgewbush.com>; Mike Magan (E-mail)

RNC 000160

<Magan@ohiogop.org>; Kevin Madden <kmadden@georgewbush.com>;
Mauk@ohiogop.org <Mauk@ohiogop.org>
CC: Christopher P. McInerney - Research/Communications
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From: Robert Paduchik
Sent: Tuesday, October 05, 2004 3:21 PM
To: 'Mike Magan'; Cuddy Johnson; Dave DenHerder; Christopher Guith
Subject: RE: Cuyahoga Returned List

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Ohio Republican Party
211 South Fifth Street
Columbus, OH 43215
Office: (614)228-2481 ext. 148
Cell: (614)425-6519
Fax: (614)228-1093
magan@ohiogop.org

-----Original Message-----

From: Robert Paduchik [mailto:bpaduchik@georgewbush.com]
Sent: Tuesday, October 05, 2004 3:16 PM
To: Cuddy Johnson; Dave DenHerder; Christopher Guith; Mike Magan
Subject: RE: Cuyahoga Returned List
Importance: High

I have just learned that Summit County has recvd 200 AB requests from "10-U voters" (these are people the BOE mails address confirmation forms to and they're returned as undeliverable). If this is true it is proof that people with questionable registrations are trying to vote absentee.

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From: Cuddy Johnson
Sent: Tuesday, October 05, 2004 3:05 PM
To: 'SReinschmiedt@rnchq.org'; Dave DenHerder; Robert Paduchik; Christopher Guith; 'Magan@ohiogop.org'; Kevin Madden; 'Mauk@ohiogop.org'
Cc: 'CMcInerney@rnchq.org'; Tim Griffin; Sean Cairncross
Subject: Re: Cuyahoga Returned List

This is goldmine

-----Original Message-----

From: Shawn Reinschmiedt - Research/Communications
<SReinschmiedt@rnchq.org>
To: Dave DenHerder <ddenherder@georgewbush.com>; Cuddy Johnson <cjohnson@georgewbush.com>; Robert Paduchik <bpaduchik@georgewbush.com>; Christopher Guith <cguith@georgewbush.com>; Mike Magan (E-mail) <Magan@ohiogop.org>; Kevin Madden <kmadden@georgewbush.com>; Mauk@ohiogop.org <Mauk@ohiogop.org>
CC: Christopher P. McInerney - Research/Communications <CMcInerney@rnchq.org>; Tim Griffin <Tgriffin@rnchq.org>; Sean Cairncross <scairncross@rnchq.org>
Sent: Tue Oct 05 14:51:50 2004
Subject: Cuyahoga Returned List

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RNC 000163

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Blaise Hazelwood - Political

From: Tim Griffin - Research/Communications
Sent: Tuesday, October 05, 2004 5:45 PM
To: cguith@georgewbush.com; Caddy Johnson; Blaise Hazelwood - Political; Terry Nelson
Cc: Shawn Reinschmidt - Research/Communications
Subject: RE: Cuyahoga Returned List

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Subject: RE: Cuyahoga Returned List

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From: Caddy Johnson
Sent: Tuesday, October 05, 2004 5:01 PM
To: Blaise Hazelwood - Political; Terry Nelson; Tim Griffin - Research/Communications
Cc: cguith@georgewbush.com
Subject: FW: Cuyahoga Returned List

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C

-----Original Message-----

From: Christopher Guith
Sent: Tuesday, October 05, 2004 4:59 PM
To: Caddy Johnson; Robert Paduchik; 'Mike Magan'; Dave DenHerder; Caroline Hunter - Legal

RNC 000164

Subject: RE: Cuyahoga Returned List

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From: Cuddy Johnson
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Sign up to be a Bush Volunteer! www.georgewbush.com/volunteer
===== Cuddy Johnson National Field Director,
Bush-Cheney '04
work: 703-647-2733
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RNC 000165

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Sent: Tuesday, October 05, 2004 3:16 PM
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RNC 000166

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From: cguith@georgewbush.com
Sent: Tuesday, October 05, 2004 5:45 PM
To: Tim Griffin - Research/Communications; Caddy Johnson; Blaise Hazelwood - Political; Terry Nelson
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Subject: Re: Cuyahoga Returned List

This is goldmine

RNC 000168

-----Original Message-----

From: Shawn Reinschmidt - Research/Communications
<SReinschmidt@rnchq.org>
To: Dave DenHerder <ddenherder@georgewbush.com>; Caddy Johnson
<cjohnson@georgewbush.com>; Robert Paduchik <bpaduchik@georgewbush.com>;
Christopher Guith <cguith@georgewbush.com>; Mike Magan (E-mail)
<Magan@ohiogop.org>; Kevin Madden <kmadden@georgewbush.com>;
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RNC 000170

Sent: Tuesday, October 05, 2004 3:16 PM
To: Caddy Johnson; Dave DenHerder; Christopher Guith; Mike Magan
Subject: RE: Cuyahoga Returned List
Importance: High

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RNC 000171



DEMOCRATIC NATIONAL COMMITTEE

DATE: October 27, 2004
TO: Charles Drake
FROM: Democratic National Committee

Your name has been filed to serve as a witness and/or challenger on Election Day, on behalf of the Republican Party.

The Democratic Party recognizes the legal right of witnesses and challengers, under Ohio election law, to perform their lawful duties.

At the same time, we are concerned that the challenge process not be abused as a means of harassing or intimidating voters, or of obstructing the ability of lawfully qualified and registered citizens to vote safely, efficiently and conveniently. Voting is one of the most sacred rights of all American citizens. We do not believe any qualified citizen should be deprived of that right without good cause.

To that end, you should be aware that Secretary of State J. Kenneth Blackwell has instructed all County Boards of Elections that "Challengers may not interfere with the voting process or unnecessarily delay it" and that "if a challenger challenges so many voters that his or her activities slow down the voting process or intimidate voters," the presiding judge must *expel* that challenger from the polling place. *Indeed it is a crime under Ohio law to be in a polling place "so as to hinder, delay or interfere with the conduct of the...election."* (ORC §3599.249(A)(5)).

Please be advised that that Democratic Party of the United States and the Ohio Democratic Party will insist on strict enforcement of the law.

Thank you for your time and attention to this important matter.



WILLIAM D. MASON
CUYAHOGA COUNTY PROSECUTOR

Dear Witness/Challenger:

Your name has been provided to the Board of Elections as a challenger to voters for the November 2 election. The constitutional right to vote is probably the most dearly held of our civil rights. And, now, more than ever, this cherished right must be encouraged and protected.

Interference with a voter's exercise of that right or with election officials' conduct of an election can result in criminal penalties. Ohio statutes create a role for challengers in the polling places, but it is the individual challenger's responsibility to be aware of the laws and procedures governing and restricting the activities of challengers at the polling places.

This letter is intended to remind challengers that the election officials and law enforcement officers are required to enforce the Election Laws, including any violations by a challenger. Further, if such violations occur, law enforcement officers will be contacted immediately, and this Office will prosecute the individuals responsible to the fullest extent of the law.

The polling place judges are specially charged by law with the duty to maintain open and unobstructed access to the polling place for voters and to prevent and stop any improper practices or attempts that are likely to obstruct, intimidate, or interfere with any elector voting. The polling place judges have the legal right to eject any challenger from the polling place for any violation of the State Election Laws.

In order to discharge their duties, polling place judges may call upon the sheriff, police officers, or other peace officers to assist them in enforcing the law. The polling place judges may order the arrest of any person violating the State Election Laws. The sheriff, police officers, and other officers of the peace are required to immediately obey and aid in the enforcement of any lawful order made by the precinct election officials in the enforcement of the State Election Laws.
R.C. 3501.33

Challengers must obey the laws and the lawful directions of election officials while at a polling place. Challenges of the qualifications of voters at the polling place are limited by law to the following matters: citizenship; state residency during the 30 days immediately preceding the election; residency of the county or precinct where the voter seeks to vote; and legal voting age (18). **R.C. 3505.20**

OFFICE OF THE PROSECUTING ATTORNEY

Justice Center • Courts Tower • 1200 Ontario Street • Cleveland, Ohio 44113
(216) 443-7800 • FAX: (216) 443-7601 • E-MAIL: MASONCCPO@AOL.COM



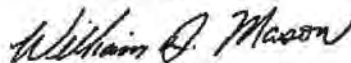
These are some of the criminal violations set out in the State Election Laws:

- No person shall unduly delay or hinder an elector from attempting to vote or voting. A person who violates this prohibition is guilty of a fifth degree felony. *R.C. 3599.26*
- No person shall attempt to intimidate an election officer, or prevent an election official from performing the official's duties. A person who violates this prohibition is guilty of a first degree misdemeanor. *R.C. 3599.24*
- No election official, witness, or challenger, while performing that person's duties related to the casting of votes, shall do either of the following:
 - (1) Wear any badge, sign, or other insignia or thing indicating that person's preference for any candidate or for any question submitted at an election;
 - (2) Influence or attempt to influence any voter to cast the voter's ballot for or against any candidate or issue submitted at an election.Any person who violates either of those prohibitions is guilty of a first degree misdemeanor. *R.C. 3599.38*
- No person shall loiter in or about a polling place during the casting or counting of ballots so as to hinder, delay, or interfere with the conduct of the election. A person who violates this prohibition is guilty of a minor misdemeanor. *R.C. 3599.24*
- A person who is convicted for violating the State Election Laws a second time shall be disqualified from the right of voting, in addition to the applicable criminal penalty for the second conviction. *R.C. 3599.39*

The penalties for a fifth degree felony can include imprisonment for six to twelve months, and a fine of up to \$2500.00. The penalties for a first degree misdemeanor can include imprisonment for up to 180 days and a fine of up to \$1000.00. The penalties for a minor misdemeanor can include a fine of up to \$150.00. *R.C. 2929.14, ~18, ~24, ~28*

Challengers fulfill a legitimate and valuable role in our election process, and their public service should not be marred by the misconduct of a few. Elections in the United States of America are a solemn expression of democracy and a beacon of freedom for the world. Together, we must all work together to ensure a fair election and a positive democratic experience for all of our citizens.

Sincerely,



William D. Mason
Prosecuting Attorney

**United States District Court
District of New Jersey**

| | |
|--|-------------------------------------|
| Democratic National Committee, <i>et al.</i>, Plaintiffs, | Civil Action No. 81-3876 |
| v. | Judge Dickinson R. Debevoise |
| Republican National Committee, <i>et al.</i>, Defendants. | |

DECLARATION OF JEFF MATTHEWS

1. My name is Jeff Matthews. I am the Director of the four-member Board of Elections in Stark County, Ohio. I have held the position of Director for 12 years and I have been an employee of the Board for a total of 13 years.

2. Members of each County's Board of Elections are nominated by their respective parties and appointed by the Secretary of State pursuant to Title 35 of the Ohio Revised Code ("Election Code") section 3501.06. No more than two members of the Board shall be from any one political party.

3. The County Board of Elections appoints a Director pursuant to Election Code section 3501.09 to administer and direct the day-to-day operations of the Board. Based on my consultations with other Directors of County Boards of Elections, the practices and procedures followed by Stark County in administering elections are consistent with those followed in Ohio's other 88 counties.

4. Boards of Elections in the state of Ohio are granted statutory authority by Election Code section 3501.11 to make and issue rules they consider necessary for the

guidance of election officers and voters and which are not inconsistent with the law, rules, directives or advisories issued by the Secretary of State.

5. During my service on the Stark County Board of Elections, I have administered 41 state and federal elections.

6. I am knowledgeable about the requirements and procedures of the Election Code, including those provisions relating to registration, challenges and provisional ballots. I am also familiar with memoranda and Directives of the Secretary of State, which provide additional instructions and procedures to the County Boards of Elections as to the proper methods of conducting elections.

QUALIFICATIONS OF OHIO ELECTORS

7. Election Code Section 3503.01 provides that every United States citizen who is of the age of eighteen years or over and who has been a resident of the state thirty days immediately preceding the election at which the citizen offers to vote, is a resident of the county and precinct in which the citizen offers to vote, and has been registered to vote for thirty days, has the qualifications of an elector and may vote at all elections in the precinct in which the citizen resides.

REGISTRATION

8. Persons in Ohio desiring to register to vote may register in various ways: By completing a voter registration form (attached as Exhibit 1) in person at a County Board of Elections Office, high school, public library, or designated agency; or by mailing a completed form to the Board; or by giving a completed form to another person or group for delivery to the Board. Some of these registration methods are more susceptible to fraud and mistake than others and the presence or absence of information

on these registrations could provide an adequate basis for challenging that registration pursuant to the Election Code.

9. Persons who register to vote and subsequently move or change their name may update their registration by completing a voter registration form, and indicating their previous address in box 12 of the form.

10. If a County Board of Elections registration list contains registrations that do not appear to be in conformance with the Election Code those registrations are subject to challenge either before the election or at the polls on Election Day. Additionally, Election Code section 3599.11 makes it a crime to knowingly make any false statement on any form for registration or change of registration.

RESIDENCE

11. Election Code Section 3503.02 describes the rules that registrars and judges of elections use in determining the residence of a person offering to register or vote. This section states that the residence of a person is that place “in which the person’s habitation is fixed and to which, whenever the person is absent, the person has the intention of returning.”

CHALLENGES

12. The procedure for challenging persons, whether before the election or at the polls on Election Day, has been a part of Ohio law for more than 50 years.

CHALLENGING A REGISTRATION BEFORE ELECTION DAY

Election Code

13. Challenges before Election Day are governed by Election Code section 3505.19. This section provides that “[a]ny person registered as an elector” may have his

right to vote at any election challenged “at any time during the year” by any qualified elector. This section also specifies that in the case of challenges made before Election Day, the Board will hold a public hearing, “of which both the challenger and challenged shall be notified.”

14. Challenges before Election Day are also governed by Election Code section 3503.24. This section specifies that challenges shall be filed “at the office of the board of elections not later than eleven days prior to the election” on a form prescribed by the Secretary of State and signed under penalty of election falsification. This section further specifies that upon receiving a challenge, the director of the Board shall promptly set a time and date for a hearing before the Board and the hearing “shall be held no later than two days prior to any election.” Further, the director of the Board shall send written notice by first class mail no later than three days before the day of the hearing to any person whose right to vote is challenged. The notice shall inform the person of the time and date of the hearing, and of the person’s right to appear and testify, call witnesses, and be represented by counsel. At the request of either party or any member of the Board, the Board shall issue subpoenas to witnesses to appear and testify, and all witnesses shall testify under oath. Immediately after a hearing the Board shall reach a decision on the challenge.

Secretary of State’s Directive

15. In addition to the statutory procedures relating to challenges before Election Day, Ohio Secretary of State J. Kenneth Blackwell issued Directive 2004-44 “Procedures for pre-challenges to voter registration” (attached as Exhibit 2) that provides additional guidance to the County Boards of Elections to establish an orderly procedure

for resolving pre-election challenges. This Directive states that if the Board determines that a challenged person is qualified to vote, that person shall be permitted to cast a regular ballot on Election Day. If the Board determines that a person challenged should be removed from the voter registration list, that person shall be removed *on a conditional basis*. Any person conditionally removed from the voter registration list who then offers to vote on Election Day shall be permitted to cast a provisional ballot if he signs the required affirmation statement. If the Board then determines the person to be a qualified elector, the person shall be reinstated to the voter registration list and his provisional ballot in that election will be counted if it was cast in his proper precinct. If at a hearing before the election, the Board deadlocks in a tie vote regarding the qualifications of a challenged person, that result shall be considered a non-decision by the Board and the person shall be permitted to cast a provisional ballot on Election Day.

PROVISIONAL BALLOTS

Election Code

16. Election Code Section 3503.16 describes the longstanding Ohio provisional balloting procedure. This procedure permits a registered voter who moves from one Ohio precinct to another within the same county to cast a provisional ballot after updating his voter registration on Election Day at his new precinct. Such person must attest to his new address in the precinct by completing a Form 12-B "Identification Envelope" prescribed by the Secretary of State (attached as Exhibit 3). The 12-B "Identification Envelope" is also commonly referred to as a provisional ballot envelope. The person must also complete the attestation described in paragraph 18. After completing the required attestations, the voter will then place his ballot inside the

envelope. If the Board determines that the information provided on the voter's affirmations is correct and that the person did not vote or attempt to vote in the election using his former voting residence address, the provisional ballot will be removed from the envelope and will be counted in the official canvass. A registered voter who moves from one county to another follows the same procedure except that he must complete a Form 12-B envelope at the County Board of Elections rather than at his new precinct. In my experience as Director of the Stark County Board of Elections, the Board has followed these procedures in past elections and the provisional balloting process has operated smoothly.

Federal Law

17. Additionally, the federal Help America Vote Act ("HAVA") now requires all states to offer provisional ballots to persons who claim they are properly registered but whose name does not appear on the registration list. This federal requirement will have little additional affect on the operation of Ohio elections because the federal provisional ballot requirement largely duplicates the longstanding Ohio provisional ballot process with which our elections officials and voters are intimately familiar.

Secretary of State's Directive

18. The Secretary of State issued Directive 2004-42 "Provisional Voting: Home Precinct Balloting Only" (attached as Exhibit 4) on October 25, 2004. This Directive provides additional advice to the County Boards of Elections on dealing with provisional ballots. This Directive makes clear that poll workers must determine the address of the person offering to vote; determine whether that address is located within that precinct and if it is not, to inform the person of his proper precinct and the location of

the polling place for that precinct. The poll worker must also advise the person that if he does not cast his ballot at the correct precinct, his ballot will not be counted for any issue or office. Provisional ballots will be provided to any person who offers to vote, but whose name does not appear on the list of eligible voters or whom an election official asserts is not eligible to vote. In order to cast a provisional ballot, the person must sign an affirmation that says:

I affirm that my name is _____, that my date of birth is _____, and at this time my voting residence is _____, in the City/Village of _____, in _____, County of the State of Ohio and that this is the only ballot that I am casting in this election. If I am voting elsewhere than the precinct where I reside, I understand that my entire ballot will not be counted.

This affirmation (attached as Exhibit 5) shall be affixed to a Form 12-B "Identification Envelope" and the person's ballot will be placed inside the envelope. If the Board determines that the information provided on the voter's affirmation is correct, the provisional ballot will be removed from the envelope and will be counted in the official canvass. As Director of the Stark County Board of Elections, I have instructed the Board, election judges, clerks and poll workers to follow these procedures during the 2004 election.

CHALLENGING A REGISTRATION ON ELECTION DAY

Election Code - Who Can Challenge

19. Challenges on Election Day are governed by Election Code section 3505.20. This section provides that "any person offering to vote may be challenged at the polling place by any challenger, any elector then lawfully in the polling place, or by

any judge or clerk of elections.” This section specifies challenge procedures and provides specific questions that the election judges shall ask of the person challenged, depending on the basis of the challenge, in order to determine the challenged person’s qualifications as an elector. In my experience as Director of the Stark County Board of Elections, judges at polling places in Stark County have followed these procedures and they have proved to be efficient and have not impeded other persons from casting their ballot. As Director of the Stark County Board of Elections, I have instructed the judges at the polling places in Stark County to follow these procedures during the 2004 election.

Election Code - Grounds for Challenge

20. Section 3505.20 of the Election Code specifies four grounds for challenging the qualifications of a person offering to vote: 1) not a U.S. citizen; 2) not a resident of Ohio for 30 days immediately preceding the election; 3) not a resident of the county or precinct; and 4) not eighteen years of age by election day.

Election Judges and Clerks Routinely Challenge

21. It is common practice for the Stark County Board of Elections and many other County Boards of Elections in the state to “flag” for challenge those registrations that have produced returned mail to the Board of Elections or those registrations identified through the National Change of Address (NCOA) System of the United States Postal Service as having moved. If the person whose mail was returned to the Board of Elections attempts to vote on Election Day claiming the address from which mail was returned as his residence, that person will be challenged by a judge or clerk of elections as not meeting the county or precinct residency requirements.

22. In Stark County, Ohio there are currently about 267,979 persons on the registration rolls. Of this number, about 17,575 have been flagged because mail from the Board of Elections to the person registered has been returned to the Board as undeliverable or because the NCOA System has identified them as having moved. If any of these 17,575 persons offers to vote on Election Day they will be challenged by the judges or clerks of elections as not meeting the county or precinct residency requirements.

23. Based on my past experience, despite the large numbers of registrations flagged for challenge, few of those registrants actually show up to vote on Election Day. I am confident that elections officials in Stark County can efficiently process voters on Election Day despite the large number of registrants flagged for challenge.

Election Code - Appointed Challengers

24. In addition to judges or clerks of elections, appointed challengers may also challenge persons at the polling place on Election Day pursuant to Election Code section 3505.21. This section describes the qualifications of challengers and the process for their appointment. Before a challenger may serve at a polling place, the County Board of Elections must have first been notified of the name and address of the challenger and the polling place at which the challenger will serve. Additionally, the challenger must take the following oath administered by the one of the judges of elections:

"You do solemnly swear that you will faithfully and impartially discharge the duties as an official challenger and witness, assigned by law; that you will not cause any delay to persons offering to vote, further than is necessary to procure satisfactory information of their qualifications as electors; and that you will not

disclose or communicate to any person how any elector has voted at such election."

Secretary of State Memoranda on Challenge Guidelines

25. Because the Election Code does not describe all the procedures and limitations for challenging voters, and because of a risk of confusion that would cause undue delays in voting, the Secretary of State issued a memorandum entitled "Challenger and Witness Guidelines" (attached as Exhibit 6) to all County Boards of Elections on October 20, 2004. This memorandum describes the policy developed to provide for the statutory rights of the challengers, while maintaining order in the polling location. The policy makes it clear that challengers may not interfere with or unnecessarily delay the voting process. If a challenger intimidates voters, the presiding judge should take immediate action including expelling the challenger from the polling place. The policy further specifies that challengers are to remain behind the table where poll workers are seated and when the challenger wishes to challenge a voter, they shall do so by notifying the presiding judge and stating their reason for challenge. The presiding judge shall whenever possible move the challenged person to an area no less than 10 feet from the poll worker table while resolving the challenge so as not to obstruct other persons voting. In my consultation with other Directors of County Boards of Elections it has been our past practice to immediately move to the side any person who is challenged so the challenge can be resolved while the poll workers continue processing other persons seeking to vote. As Director of the Stark County Board of Elections, I have instructed the judges at the polling places in Stark County to follow these procedures during the 2004 election.

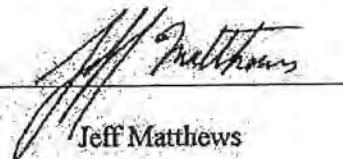
Person Challenged May Attest to His Eligibility and Cast a Regular Ballot

26. A person challenged at the polling place on Election Day will not be denied the opportunity to cast a ballot.

27. In my experience, virtually all challenges on Election Day are based on the registrant not meeting the county or precinct residency requirement. But no matter what the reason for the challenge, election officials will offer the person who is challenged the opportunity to attest to his eligibility to vote in that precinct by completing a Form 10-U "Affidavit-Oath-Examination of Person Challenged" (attached as Exhibit 7) prescribed by the Secretary of State. After completing a Form 10-U, that person will be permitted to cast a regular ballot.

28. In the unlikely event that a person would refuse to complete and sign a form 10-U attesting to his eligibility, he would still be permitted to cast a provisional ballot by completing the affirmation described above in paragraph 18. If the Board determines that the information provided on the person's provisional ballot affirmation is correct, and the person was properly registered in the precinct in which he cast the provisional ballot, then the ballot will be removed from the envelope and will be counted in the official canvass.

I declare under penalty of perjury that the foregoing is true and correct to best of my belief.


Jeff Matthews