

October 14, 2008

**SUBMISSION UNDER SECTION 5
OF THE VOTING RIGHTS ACT**

**FILED BY DOJ ELECTRONIC FILING SYSTEM
EXPEDITED REVIEW REQUESTED**

Mr. Christopher Coates
Chief, Voting Section
Civil Rights Division
Room 7254 – NWB
Department of Justice
1800 G Street, N.W.
Washington, D.C. 20006

Re: State of Georgia Section 5 Submission No. 2008-15:
DOJ File No. 2008-5243.
Voter Registration and Citizenship Confirmation Data Matching
Verification, Voter Eligibility and Information Use Process.

Dear Mr. Coates:

As you know, over the past several weeks you and your staff have been working with my staff and the Office of the Secretary of State to address concerns or questions that have arisen regarding the voter registration process in Georgia. I thank you and your staff for your professionalism and cooperation during those discussions.

During those talks, questions were raised regarding the comparison of information collected from an applicant to register to vote and information contained in the State's driver's license database maintained by the Department of Driver's Services (DDS). In particular, these discussions focused on the comparison of the data for verification of citizenship information provided when registering to vote. Ultimately, by letter dated October 8, 2008, you recounted those concerns and asked that the State submit this process for review and preclearance under Section 5 of the Voting Rights Act of 1965, as amended (42 U.S.C. § 1973c). It is the intent of this letter to submit all aspects of this process for review and preclearance by the U.S. Attorney General pursuant to Section 5.

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Expedited review is requested for this submission pursuant to 28 C.F.R. § 51.34 because the November 4, 2008 general election is imminent and questions as to the qualifications and eligibility of voters need to be resolved prior to that election and because, as noted below, litigation is currently pending in the United States District Court for the Northern District of Georgia which in part addresses the question of whether this process has been submitted and precleared by the U.S. Attorney General.

As indicated above, though, the circumstances surrounding this submission have been somewhat unusual. Given this, I think it would be helpful to provide some background on the State's actions and position in relation to the questions presented and in relation to the submission being made here.

The Georgia process involved in this submission provides that when a person registers to vote, or when a voter changes some specific, critical information regarding his or her voter registration, the Secretary of State's office attempts to verify the applicant's personal information through a "data match" with information on file with the DDS. One piece of data that is provided by an applicant for registration is whether he or she is a U.S. citizen. When an individual applies for a driver's license or DDS issued identification card in Georgia, the law requires that the person provide proof of either U.S. citizenship or, if the person is not a citizen, of lawful residence in the country. DDS maintains that citizenship data as a part of its database. Therefore, citizenship data provided by a registrant, just like other information such as address or date of birth, is verifiable with the DDS through a data-matching process. Additionally, if an applicant does not provide a Georgia driver's license number but instead provides the last four digits of his or her social security number, then the DDS will also attempt to match that applicant's record with information on file with the U.S. Social Security Administration (SSA).¹

An inquiry as to the citizenship of a registration applicant is consistent with provisions under Georgia law regarding both registering to vote and obtaining a driver's license or an identification card from DDS. Under both the Georgia Constitution and provisions within the Georgia Election Code, a person must be a citizen of the United States in order to register and vote in Georgia. GA. CONST. Art. II, Sec. I, Para. II; O.C.G.A. § 21-2-216(a)(2). Applicants for registration are asked to provide citizenship information pursuant to O.C.G.A. § 21-2-220(b). Additionally, under Georgia law, only residents of

¹ I understand that by letter dated October 10, 2008, you have separately inquired of the Georgia Secretary of State as to questions you have regarding the numbers of matches conducted by the DDS and the Social Security Administration over the past federal fiscal year and that the Secretary will be responding promptly to your inquiry.

the State of Georgia may obtain either a driver's license or an identification card from DDS. O.C.G.A. § 40-5-20(a) ("Any person who is a resident of this state for 30 days shall obtain a Georgia driver's license before operating a motor vehicle in this state."); O.C.G.A. § 40-5-100(a) ("The department shall issue personal identification cards to all residents as defined in Code Section 40-5-1 who make application to the department . . ."). As a part of the law defining who may be a "resident" under the motor vehicle code, the law provides that no person may be considered a resident unless that person is either a United States citizen or an alien with legal authorization from the U.S. government for his or her residency. O.C.G.A. § 40-5-1(15).²

This data matching process noted above is not one that was arbitrarily implemented by the State, but is instead the result of the passage and implementation of the *Help America Vote Act of 2002*, 42 U.S.C. § 15301 through 15544, otherwise known as HAVA. Among other provisions, this federal law mandates that the Secretary of State, as Georgia's chief election official, maintain a statewide computerized voter registration list. 42 U.S.C. § 15483. Additionally, HAVA (along with the National Voter Registration Act of 1993 [NVRA], 42 U.S.C. § 1973gg-4), provides that individuals may register to vote by use of a mail-in voter registration application which must be accepted by the state. 42 U.S.C. § 15483(b).

However, in addressing this mail-in voter registration issue, HAVA provides additional requirements. *Id.* One of those additional requirements is that an applicant for registration must answer, "Are you a citizen of the United States of America?" 42 U.S.C. § 15483(b)(4)(A)(i). If an applicant answers "no" to that question, then the congressionally mandated registration form should not be completed or submitted for registration purposes. 42 U.S.C. § 15483(b)(4)(A)(iii). If the question is not answered at all, a registrar must notify the applicant and give him or her an opportunity to complete the form prior to the next Federal election, commensurate with any time limits for registration under state law. 42 U.S.C. § 15483(b)(4)(B).

Additionally, as a part of this system, HAVA prohibits a state from accepting for registration an application unless certain verifiable information is provided, if possible. 42 U.S.C. § 15483(a)(5). For an applicant who has a current and valid driver's license, the applicant must provide his or her driver's license number. 42 U.S.C. § 15483(a)(5)(A)(i)(I). For any other applicant, the applicant must provide the last four

² Acceptable documentation for these categories is identified under O.C.G.A. §§ 40-5-21.1 and 40-5-21.2. *See also* Georgia Department of Driver's Services Website (<http://www.dds.ga.gov/drivers/DLdata.aspx?con=1744173714&ty=dl>) (Last visited October 11, 2008).

digits of his or her social security number. 42 U.S.C. § 15483(a)(5)(A)(i)(II). If an applicant has neither a current and valid driver's license nor a social security number, only then may a state assign that applicant a unique voter registration number for identity purposes. 42 U.S.C. § 15483(a)(5)(A)(ii). It is up to the state "to determine whether the information provided by an individual is sufficient to meet the requirements of this subparagraph [of the Act], in accordance with State law." 42 U.S.C. § 15483(a)(5)(A)(iii).

Once a state has collected either a driver's license number or the last four digits of a social security number, HAVA then mandates that the state act to "verify the accuracy of the information provided on applications for voter registration." 42 U.S.C. § 15483(a)(5)(B)(i). Specifically, HAVA requires:

The chief State election official and the official responsible for the State motor vehicle authority shall enter into an agreement to match information in the database of the statewide voter registration system with information in the database of the motor vehicle authority to the extent required to enable each such official to verify the accuracy of the information provided on applications for voter registration.

Id. Additionally, HAVA requires that:

The official responsible for the State motor vehicle authority shall enter into an agreement with the Commission of Social Security under section 205(r)(8) of the Social Security Act.

42 U.S.C. § 15483(a)(5)(B)(ii). The Social Security Administration (SSA) may then verify the accuracy of information provided by a state's motor vehicle authority "with respect to applications for voter registration, for whom the last 4 digits of a social security number are provided instead of a driver's license number." 42 U.S.C. § 15483(a)(5)(C) (amending the Social Security Act, 42 U.S.C. § 405(r)(8)(C)). This verification covers the first name, last name, date of birth, social security number and whether the identified individual is deceased. *Id.* amending 42 U.S.C. § 405(r)(8)(D)(i)(I).

The State of Georgia is HAVA compliant in that it has both of these mandated requirements in place. On May 23, 2007, the Secretary of State and the DDS entered into the required agreement providing for a verification of information provided by a Georgia resident for voter registration purposes. See **Exhibit A-1** attached. This data specifically

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includes (where applicable) an applicant's first and last name, date of birth, the last four-digits of the applicant's social security number and the applicant's driver's license number, as well as any other information identified for verification purposes. *See* Paragraphs 1 and 4 of **Exhibit A-1**. This information includes a verification of the citizenship data provided by the applicant. The understanding to include citizenship data was apparently made in November 2006 during the administration of the previous Secretary of State as a part of initial discussions on setting up the matching process. *See* **Exhibit A-2**. The business rules were outlined on a spreadsheet and describe the position and length of the various data fields to be matched, including citizenship.

Additionally, on April 23, 2007, the Chief of the Voting Section wrote to the Secretary of State inquiring as to whether the State was in compliance with HAVA by having in place an agreement between DDS and the SSA. *See* **Exhibit A-3**. On May 23, 2007, my staff responded on behalf of the Secretary with documentation showing that Georgia's DDS had entered into the required agreement in order to comply with HAVA. **Exhibit A-4**.

The above described statutory framework, created both by federal and state law, has therefore created the following situation. When an individual applies to register to vote in Georgia, he or she must state whether he or she is a U.S. citizen. HAVA then mandates that this registration information be provided by the Secretary of State to the DDS in order to, "verify the accuracy of the information provided on applications for voter registration." HAVA provides no additional guidance as to the specific information to be verified, but given that HAVA also requires the applicant to indicate U.S. citizenship on applying to vote, Congress must have intended that this citizenship data be considered as part of the "information provided on application for voter registration." The DDS has the ability to verify the registration information provided, including whether the applicant has verified that he or she is a U.S. citizen. Thus, under the system designed by HAVA, the Secretary of State is providing citizenship data to DDS and DDS is verifying that citizenship data along with other information provided for voter registration purposes. It is the intention of the State to use this data verification system to both confirm identity and eligibility of persons to register and vote, including using the citizenship data contained within the system.

The result of this process, though, is that the information verification process produces *prima facie* data which shows that an applicant for registration may not be a U.S. citizen. This data is available to county voter registrars by virtue of their access to the HAVA-mandated statewide voter registration system. A county board of registrars is charged by law with assuring that a voter has the necessary qualifications to vote, which would include determining whether the voter is a citizen of the U.S. O.C.G.A. § 21-2-228(a). County registrars carry out that responsibility by reviewing the HAVA-mandated "information provided on application for voter registration." The result of all of this is

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that HAVA itself creates a situation where a voter registrar, in verifying the accuracy and qualifications of an applicant to register to vote, is then faced with data that shows that the applicant may not be a U.S. citizen and not eligible to either register or vote.

Under Georgia law, a process is established by which registrars may challenge the qualifications of an applicant, including providing notice to the applicant, holding a hearing and the right of an applicant to appeal an adverse decision. O.C.G.A. § 21-2-228. This is neither a routine form of “list maintenance” nor a systematic removal of voters, but is instead an individualized and particularized examination of a registrant’s qualifications to vote. If a registrar is faced with factual information that an applicant is not qualified to vote, whether that information comes from the HAVA-mandated data verification process or other reliable information provided such as an individual complaint or contradictory documentation, the registrar must as a matter of law address that question and determine whether the applicant is indeed qualified.

This is all that is happening under the process which is at the heart of your October 8 inquiry. By virtue of the federally created and mandated data match with DDS and the data that is available for verification purposes, evidence is being generated raising questions regarding the accuracy of information provided by an applicant. A voter registrar, in holding a hearing on this issue, is doing nothing more than addressing that verification issue which has been created under these circumstances as provided by state and federal law.

Given this situation, the State has not previously submitted these facts and processes for preclearance by the Attorney General. The State was acting under the good-faith belief that the processes in question were either mandated by Congress, and therefore not subject to the preclearance requirements of Section 5, or that the state-related actions were authorized under the Georgia Election Code, the provisions of which have been previously precleared. However, in order to clear up any outstanding issues in relation to this entire process, in my capacity as chief legal officer of the State of Georgia, pursuant to the Voting Rights Act of 1965, as amended (42 U.S.C. § 1973c), I hereby submit for preclearance the entire aforementioned data collection and matching process between the statewide voter registration database and the DDS database. This process will be used to determine whether a person may or may not be qualified to register to vote or to vote in Georgia and may lead to a voter’s qualifications being individually challenged by registrars.

These voter registration verification activities do not have the purpose or effect of abridging the right to vote or seek office on account of race, color or membership in a minority group and should, therefore, be precleared. 28 C.F.R. § 51.52(a).

For purposes of clarity and assuring that as much information is provided for your review as is possible in this time frame and in accordance with the required contents for submission set forth in 28 C.F.R. § 51.27, the State of Georgia hereby submits the following information with respect to this request.

- (a) A copy of any ordinance, enactment, order, or regulation embodying a change affecting voting.

There is no new statutory or regulatory enactment submitted for preclearance in this submission. The entire process of the comparison of voter registration with data contained on the DDS database, as described above, is submitted for preclearance, including the use of citizenship data.

To the extent that there is documentation describing this process, please find attached as **Exhibit B-1** the September 24, 2008, guidance memorandum provided by Mr. Wesley Taylor, who is the director of the Elections Division of the Office of the Georgia Secretary of State, to local county election officials, including the voter registrar of each of Georgia's 159 counties. This memorandum describes the Secretary of State's understanding of the operation of the matching system and guidance to the local election officials on how the system should operate.

Local election officials had previously been trained on the use and operation of this process. Copies of the training materials, provided to attendants at the August, 2007 and March, 2008 annual training conferences of the Voter Registrars Association of Georgia, are attached as **Exhibits B-2** and **B-3**. These materials address this data matching process and other registration issues and also include reproduction of the computer screen views that registrars see when they access a voter registrant's file.³ There is also a lack of clarity in the discussion of the citizenship verification data in that the materials do not specifically identify that the verification on citizenship comes only from the DDS and does not come from any activity of the Social Security Administration. Mr. Taylor's September 24 memo was intended to clear up any misunderstandings in this context. To the extent that it deemed necessary that the Attorney General preclear the appearance of the local voter registrar's computer screen in conducting his or her review of the results

³ It is my understanding that these "screen shots" do not reflect the files of actual voters but are fictitious and created for the purposes of training examples.

of the data matching and verification process, those “screens” are also submitted for preclearance.

Additionally, the data verification process will be triggered under the statewide voter registration system if an existing registrant changes what is deemed a “critical” identifying field in his or her voter registration record. These critical fields include the voter’s first name, last name, date of birth, driver’s license number or last four digits of his or her social security number. All of these fields are deemed “critical” because they go to the very essence of the HAVA mandated data match and changes in these fields, which would normally remain static, may be significant indications of attempts to fraudulently register and vote.

As a part of the registration data verification process, a local voter registrar may access the Georgia statewide voter registration database, as noted above, and may also produce reports indicating the matching verification status of voter registrants. Those reports are identified in Mr. Taylor’s September 24 memorandum as the SSVRZ791R1 and SSVRZ791R2 reports. These reports are identical in format, with the “R1” version of the report showing matching results in all categories and the “R2” version of the report listing only those individuals who were described as “non-citizens” through the matching process. An example of one such report obtained from the Cobb County Board of Elections and Registration is attached as **Exhibit B-4**. To the extent that such reports, including their format and the information contained therein, are required to be submitted for preclearance, that request is made here as well.

Based upon a review of the data produced by the matching process outlined above, a voter registrar may challenge the qualifications of a voter pursuant to a registrar’s statutory duties under O.C.G.A. § 21-2-226 and in accordance with the statutory procedures outlined in O.C.G.A. § 21-2-228, including notice of a hearing, an opportunity to be heard and a right to appeal to a superior court. In following such a process, a registrar would provide written notice to a challenged registrant. To the best of my knowledge, the U.S. Attorney General has never taken the position that such written notices must also be specifically precleared under Section 5 of the Voting Rights Act. Such a requirement, essentially holding that the daily correspondence of election officials in 159 Georgia counties or through the Office of the Secretary of State could not be distributed without prior preclearance from the U.S. Attorney General, would be completely impractical if not impossible. Nonetheless, there have been

indications that some persons or groups feel that such approval is necessary or is necessary at least in relation to this particular process. Attached as **Exhibit B-5** is an example of such a notice or challenge letter sent to a registrant as it relates specifically to the citizenship verification process. I do not believe that such correspondence is uniform throughout the state and offer it as demonstrative as one example of this communication. To the extent that it or other similar correspondence needs preclearance, it is offered for such here.

- (b) A copy of any ordinance, enactment, order, or regulation embodying the voting practice that is proposed to be repealed, amended, or otherwise changed.

Prior to 2006, Georgia was exempt from the data matching and verification procedures required under HAVA because the State required that voters provide their full nine-digit social security number when registering to vote. *See* 42 U.S.C. § 15483(a)(5)(D). However, as you are aware from previous submissions, the State was prohibited from continuing this requirement through litigation. *See Schwier v. Cox*, 412 F. Supp. 2d 1266 (N.D. Ga. 2005), *aff'd*, 439 F.3d 1285 (11th Cir. 2006). Therefore from 2006 forward, the State moved forward to comply with the aforementioned requirements of HAVA for identification and verification of voter registrants. Because the State believed that the process provided under HAVA included the process included here, it was not previously submitted for preclearance.

- (c) If the change affecting voting either is not readily apparent on the face of the documents provided under paragraphs (a) and (b) of this section or is not embodied in a document, a clear statement of the change explaining the difference between the submitted materials adequate to disclose to the Attorney General the difference between the prior and proposed situation with respect to voting.

The changes in practice, procedure or process have been described above and all such aspects of this issue are submitted for preclearance by the Attorney General.

- (d) The name, title, address and telephone number of the person making the submission.

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40 Capitol Square, S.W.
Atlanta, Georgia 30334-1300
404-656-3300

Please direct all communications to:

Dennis R. Dunn
Deputy Attorney General
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Atlanta, Georgia 30334-1300
404-656-5614

- (e) The name of the submitting authority and the name of the jurisdiction responsible for the change, if different.

The submitting authority is the Georgia Attorney General. The changes described would be implemented by the Secretary of State and local voter registrars.

- (f) If the submission is not from a state or county, the name of the county and State in which the submitting authority is located.

Not applicable.

- (g) Identification of the person or body responsible for making the change and the mode of decision (e.g., act of state legislature, ordinance of city council, administrative decision by registrar).

As described above, the data verification process is mandated under HAVA. To the extent that particular data is identified, including citizenship, for purposes of verifying eligibility to register or remain registered to vote, the guidance on this issue has been provided by the Secretary of State. Additionally, the Secretary is a party to the agreement for data verification with the DDS.

The Secretary of State, however, does not add voters' names to nor remove their names from the statewide voter registration list, except in the instance of deceased voters pursuant to O.C.G.A. § 21-2-231(e). Local voter registrars perform this function. The local registrars will be the officials charged with determining whether a challenge to a voter's qualifications, including citizenship, should be made and what proceedings should be undertaken in addressing any such challenge.

- (h) A statement identifying the statutory or other authority under which the jurisdiction undertakes the change and a description of the procedures the jurisdiction was required to following in deciding to undertake the change.

Georgia has implemented the registration data verification system pursuant to HAVA, specifically 42 U.S.C. § 15483. To the extent that Georgia is seeking to verify the U.S. citizenship of voters, it is doing so pursuant to HAVA, as well as state law. GA. CONST. Art. II, Sec. I, Para. II; O.C.G.A. §§ 21-2-216(a)(2), 21-2-220(b), 21-2-226, 21-2-228. The actual implementation of the data verification process has been undertaken by the Office of the Secretary of State in conjunction with the Department of Driver Services. There have been no specific statutes passed or rules promulgated on this subject, as this is being accomplished pursuant to federal law and previously precleared state statutes.

- (i) The date of the adoption of the change affecting voting.

As noted above, staff members of the former Secretary of State and the DDS discussed the data matching process in November 2006 and identified the fields that would be matched, including citizenship. The actual data sharing agreement between the Secretary of State and DDS was entered into on March 27, 2007. The agreement between DDS and SSA was agreed to by the Commissioner of SSA on April 23, 2007. As described above, it appears that the process has been addressed with local registrars as early as August of 2007. Mr. Taylor's September 24 memorandum (**Exhibit B-1**) summarizes the current status of the Secretary's understanding of the process.

- (j) The date on which the change is to take effect.

As you know, the process was in effect at the time of your inquiry. However, I understand that Cobb County, which had been at the center of some of the controversy here, has suspended any further challenge

hearings. As noted below, a request for a temporary restraining order is currently pending in the United States District Court. Any such order entered by the Court would affect how this process proceeds in the future. As noted above, expedited preclearance is requested to permit its continued usage.

- (k) A statement that the change has not yet been enforced or administered or an explanation why such a statement cannot be made.

As you know, the process is currently in effect. Expedited preclearance is requested to permit its continued usage. The development of this situation is described above.

- (l) Where the change will affect less than the entire jurisdiction, an explanation of the scope of the change.

The change will affect the entire State of Georgia.

- (m) A statement of the reasons for the change.

Federal and state law clearly provide that only U.S. citizens may register and vote in federal and state elections. HAVA has provided for a data verification process to be established between the Secretary of State and the DDS for purposes of verifying registration data. One such element of data that is available through both the voter registration and DDS databases is citizenship status. DDS maintains this information based upon the self-reporting and documentation provided by applicants for driver's licenses and identification cards. To the extent that the data verification process is to be used for purposes of determining an individual's eligibility to register or vote in Georgia, this data is readily available and provides a local voter registrar with relevant information to determine whether a person may be properly registered as a voter. The local registrar may then conduct an individualized and particularized fact-finding process to determine whether the individual in question is a U.S. citizen or otherwise eligible to be registered to vote.

- (n) A statement of the anticipated effect of the change on members of racial or language minority groups.

The proposed changes will not adversely affect members of racial or language minority groups in Georgia. The data matching requirement provided for under federal and state law is race neutral. The criteria used by the State, including citizenship, are race neutral as well.

- (o) A statement identifying any past to pending litigation concerning the change or related voting practices.

A complaint challenging this process has been filed in the United States District Court for the Northern District of Georgia in the case of *Jose Morales v. Karen Handel*, Civil Action No. 1:08-CV-3172-JTC. A copy of the complaint in that action is attached as **Exhibit C**. The Plaintiff has moved for a temporary restraining order and preliminary injunction to prevent the enforcement of the process described in this submission based upon a lack of Section 5 preclearance for the process and upon an alleged violation of the 90 day “quiet period” provided for under the National Voter Registration Act, 42 U.S.C. § 1973gg-6(c)(2). Copies of the motion and brief and materials are available for your review if you would like them.

A hearing was held before the Honorable Jack Camp on October 10, 2008, but the Court has not issued an order on the motion. The Court has asked that a Three-Judge Court be constituted for purposes of addressing the Plaintiff’s Section 5 claim.

- (p) A statement that the prior practice has been precleared (with the date) or is not subject to the preclearance requirement and a statement that the procedure of the adoption of the change has been precleared (with the date) or is not subject to the preclearance requirement, or an explanation of why such statements cannot be made.

The Georgia Constitution has been previously precleared by the Attorney General by letter dated January 29, 1982. The Georgia statute defining U.S. citizenship as a qualification for voting, O.C.G.A. § 21-2-216, and providing the challenge procedures by registrars questioning the qualifications of voters, O.C.G.A. § 21-2-228, were precleared by U.S. Attorney General on August 10, 1998, under DOJ File Nos. 98-1651, -1771 and -1822. The statute providing that registrars in fact have a duty

to determine the eligibility of applicants for registration, O.C.G.A. § 21-2-226, was precleared July 27, 2001, under DOJ File No. 2001-1627. The statute dealing with removing deceased voters from the registration list, O.C.G.A. § 21-2-231, was last precleared on August 27, 2008, under DOJ File No. 2008-3689.

- (q) For redistricting and annexations: the items listed under § 51.28(a)(1) and (b)(1); for annexations only, the items listed under § 51.28(c)(3).

Not applicable.

- (r) Other information that the Attorney General determines is required for an evaluation of the purpose or effect of the change.

Not applicable.

Pursuant to 28 C.F.R. § 51.28, the following additional information is submitted.

- (a) Demographic information.

Not applicable.

- (b) Maps.

Not applicable.

- (c) Annexations.

Not applicable.

- (d) Election returns.

To the best of my knowledge, there are no election returns relevant to this action.

- (e) Language usage.

To the best of my knowledge, the action does not affect the use of the language of a minority group in the elective process.

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(f) Publicity and participation.

The subject of the use of citizenship for registration verification purposes has been the subject of press coverage and publicity, both before and after the filing of the *Morales* litigation.

(g) Availability of the submission.

The submission will be advertised by a legal advertisement in the Atlanta Journal and Constitution as shown in **Exhibit D.**

(h) Minority group contacts.

Ms. Linda W. Latimore
Election Supervisor, DeKalb County
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(404) 298-4020

There is no further information that is known to be relevant to the consideration of this submission

Sincerely,

THURBERT BAKER
Attorney General

TB:DRD:me

Enclosures