

EXHIBIT A

**DEFENDANTS’ OBJECTIONS TO
ITCA PLAINTIFFS’ TRIAL EXHIBITS**

ITCA Plaintiffs’ Exhibit No.	Description	Objection
Exhibits ITCA Plaintiffs’ Expect to Offer at Trial		
1.	Exhibit A to Responses of the Arizona Advocacy Network to State Defendants’ First Set of Interrogatories.	Relevance/hearsay/materiality/foundation/Rule 403
2.	ITCA Financial Burden to Provide Information on Proposition 200 attached to First Supplemental Responses of the Inter Tribal Council of Arizona, Inc. to State Defendants’ First Set of Interrogatories No. 1, 2, 13 and 14	Relevance/hearsay/materiality/foundation/Rule 403
3.	Report of the number of voters who left Coconino County polling places without casting any ballot in the November 2006 General Election [ITCA00051-56]	Relevance/hearsay/materiality/foundation/Rule 403
4.	Report of the number of voters who left Apache, Cochise, Gila, Graham, Greenlee, La Paz, Maricopa, Mohave, Pima, Pinal, Santa Cruz, Yavapai and Yuma County polling places without casting any ballot in the November 2006 General Election	Relevance/hearsay/materiality/foundation/Rule 403
5.	Answers to First Set of Interrogatories by Santa Cruz County Recorder and County Elections Director.	
6.	Defendants Ana Wayman-Trujillo, Yavapai County Recorder, and Defendant Lynn A. Constabile, Yavapai County Elections Director, Responses to Plaintiffs’ Second Set of Non-Uniform Interrogatories to County Defendants, including App.	

ITCA Plaintiffs' Exhibit No.	Description	Objection
	A-C	
7.	Greenlee County Defendants Responses to ITCA Plaintiffs' Second Set of Non-Uniform Interrogatories to County Defendants, including attached spreadsheet	
8.	Answers to Second Set of Interrogatories by Santa Cruz County Recorder and County Elections Director	
9.	Yuma County Defendants Responses to ITCA Plaintiffs' Second Set of Non-Uniform Interrogatories to County Defendants, including attachments A-D	
10.	Graham County Defendants Responses to ITCA Plaintiffs' Second Set of Non-Uniform Interrogatories to County Defendants, including attachments	
11.	Navajo County Defendants' Answers to ITCA Plaintiffs' Second Set of Non-Uniform Interrogatories, including Exhibit 1	
12.	Mohave County Defendants Responses to ITCA Plaintiffs' Second Set of Non-Uniform Interrogatories to County Defendants, including attached reports	
13.	Pinal County Defendants Answers to ITCA Plaintiffs' Second Set of Non-Uniform Interrogatories	
14.	Gila County Defendants Response to Second Set of Non-Uniform Interrogatories, including Appendices A-D to Responses to Second Set of Requests for Production	
15.	Coconino County Defendants' Answers to ITCA Plaintiffs' Second	

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	Set of Non-Uniform Interrogatories	
16.	Cochise County's Answers to Plaintiffs' Interrogatories (2nd Set)	
17.	Defendant Apache County's Response to ITCA Plaintiffs' Second Set of Non-Uniform Interrogatories, including canvass count	
18.	Pima County's Response to ITCA Plaintiffs' Second Set of Non-Uniform Interrogatories to County Defendants	
19.	Defendant La Paz County's Answers to ITCA Plaintiffs' Second Set of Interrogatories.	
20.	Coconino County Defendants' Supplemental Answers to First Set of Interrogatories from Plaintiffs Inter Tribal Council of Arizona, et al., including Supplemental Attachment 1	
21.	Coconino County Defendants' Supplemental Answers to ITCA Plaintiffs' Second Set of Non-Uniform Interrogatories, and attached report	
Exhibits the ITCA Plaintiffs May Offer at Trial		
1.	All exhibits admitted by any party during the preliminary injunction hearings held in this matter on August 30-31, 2006 and February 8, 2007	Relevance/hearsay/materiality/foundation/Rule 403
2.	February 4, 2003 letter from Ralph Boyd, Jr., Assistant Attorney General, to Jean Wilcox, Deputy Coconino County Attorney (Exhibit 6 to Responses of the Inter Tribal Council of Arizona, Inc. to Second Set of Interrogatories by the Arizona Secretary of State)	Relevance/hearsay/materiality/foundation/Rule 403
3.	Statement of the Inter-Tribal Council of Arizona Before the National	Relevance/hearsay/materiality/foundation/Rule 403

ITCA Plaintiffs' Exhibit No.	Description	Objection
	Commission on the Voting Rights Act, April 7, 2005 (Exhibit 1 to Responses of the Inter Tribal Council of Arizona, Inc. to Second Set of Interrogatories by the Arizona Secretary of State)	
4.	The History of Indian Voting in Arizona (Exhibit 2 to Responses of the Inter Tribal Council of Arizona, Inc. to Second Set of Interrogatories by the Arizona Secretary of State)	Relevance/hearsay/materiality/foundation/Rule 403
5.	Native Vote: American Indians, the Voting Rights Act, and the Right to Vote, Daniel McCool, Susan M. Olson and Jennifer L. Robinson (1st ed. 2007)	Relevance/hearsay/materiality/foundation/Rule 403
6.	Representation Without Taxation: Citizenship and Suffrage in Indian Country (Exhibit 3 to Responses of the Inter Tribal Council of Arizona, Inc. to Second Set of Interrogatories by the Arizona Secretary of State)	Relevance/hearsay/materiality/foundation/Rule 403
7.	Voting Rights in Arizona, 1982-2006 (Exhibit 4 to Responses of the Inter Tribal Council of Arizona, Inc. to Second Set of Interrogatories by the Arizona Secretary of State)	Relevance/hearsay/materiality/foundation/Rule 403
8.	Voting Patterns by Race/Ethnicity in Arizona Congressional and Legislative Elections, 1996-2000 (Exhibit 5 to Responses of the Inter Tribal Council of Arizona, Inc. to Second Set of Interrogatories by the Arizona Secretary of State)	Relevance/hearsay/materiality/foundation/Rule 403
9.	Key Indicators of the Status of the Arizona On-Reservation Indian Population (Exhibit 7 to Responses of the Inter Tribal Council of Arizona, Inc. to Second Set of Interrogatories by the Arizona Secretary of State)	Relevance/hearsay/materiality/foundation/Rule 403

ITCA Plaintiffs' Exhibit No.	Description	Objection
	Secretary of State)	
10.	U.S. Census Bureau, American FactFinder, State of Arizona (S0501) Selected Characteristics of the Native and Foreign-Born Populations, 2006 American Community Survey	Relevance/hearsay/materiality/foundation/Rule 403
11.	U.S. Census Bureau, American FactFinder, State of Arizona (S0101) Age and Sex, 2006 American Community Survey	Relevance/hearsay/materiality/foundation/Rule 403
12.	U.S. Census Bureau, American FactFinder, State of Arizona, PCT43: Sex by Place of Birth by Citizenship Status, Census 2000 Summary File 4 (SF4) – Sample Data	Relevance/hearsay/materiality/foundation/Rule 403
13.	U.S. Census Bureau, American FactFinder, State of Arizona, PCT44: Sex by Age by Citizenship Status, Census 2000 Summary File 4 (SF4) – Sample Data	Relevance/hearsay/materiality/foundation/Rule 403
14.	U.S. Census Bureau, American FactFinder, State of Arizona, PCT55: Means of Transportation to Work for Workers 16 Years and Over, Census 2000 Summary File 4 (SF4) – Sample Data	Relevance/hearsay/materiality/foundation/Rule 403
15.	U.S. Census Bureau, American FactFinder, State of Arizona, HCT33: Tenure by Vehicles Available, Census 2000 Summary File 4 (SF4) – Sample Data	Relevance/hearsay/materiality/foundation/Rule 403
16.	U.S. Census Bureau, American FactFinder, State of Arizona, HCT34: Aggregate Number of Vehicles Available by Tenure, Census 2000 Summary File 4 (SF4) – Sample Data	Relevance/hearsay/materiality/foundation/Rule 403

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17.	U.S. Census Bureau, American FactFinder, State of Arizona, PCT65: Sex by Age by Educational Attainment for the Population 18 Years and Over, Census 2000 Summary File 4 (SF4) – Sample Data	Relevance/hearsay/materiality/foundation/Rule 403
18.	U.S. Census Bureau, American FactFinder, State of Arizona, PCT142: Poverty Status in 1999 by Sex by Age, Census 2000 Summary File 4 (SF4) – Sample Data	Relevance/hearsay/materiality/foundation/Rule 403
19.	U.S. Census Bureau, American FactFinder, State of Arizona, HCT36: Median Household Income in 1999 (Dollars) by Tenure, Census 2000 Summary File 4 (SF4) – Sample Data	Relevance/hearsay/materiality/foundation/Rule 403
20.	Arizona objections pursuant to Section 5 of the Voting rights Act, (http://www.usdoj.gov/crt/voting/sec_5/az_obj2.htm)	Relevance/hearsay/materiality/foundation/Rule 403
21.	List of Native American elected officials (Exhibit 8 to Responses of the Inter Tribal Council of Arizona, Inc. to Second Set of Interrogatories by the Arizona Secretary of State)	
22.	NALEO report concerning elected Latino officials in Arizona (http://www.naleo.org/downloads/NALEOFactSheet07.pdf)	Relevance/hearsay/materiality/foundation/Rule 403
23.	Maricopa County Elections Department documents re Petition Partners (Exhibit 28 to Osborne Deposition)	Hearsay/foundation
24.	Maricopa County Elections Department list of “Public Requesting Letters for ICE,” dated 1/10/2008 (Exhibit 29 to Osborne Deposition)	
25.	Maricopa County Elections	

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	Department list of "Non-Citizen Cancellations" (Exhibit 30 to Osborne Deposition)	
26.	Maricopa County Elections Department list of "Felony-Conviction Cancellations" (Exhibit 31 to Osborne Deposition)	
27.	Maricopa County Superior Court records in Case Nos. CR2005-015048, CR2005-015049, CR2005-015051, CR2005-105052, CR2005-015053, CR2005-015054, CR2005-015058, CR2005-015059, CR2007-008629, CR2007-008634, CR2007-008635, CR2007-008636, CR2007-008637 and CR2007-008638 (Exhibit 32 to Osborne Deposition)	
28.	Maricopa County Superior Court records in Case Nos. CR2004-018046, CR2005-015050, CR2005-011813, CR2005-011814, CR2005-011815, CR2005-011816, CR2005-011817, CR2005-011819, CR2007-008309, CR2007-008625, CR2007-008626, CR2007-008627, CR2007-008628, CR2007-008630, CR2007-008631, CR2007-008632, CR2007-008633 and CR2007-009336, (Exhibit 33 to Osborne Deposition)	
29.	September 2, 2005 letter from F. Ann Rodriguez to Janice K. Brewer re September 1, 2005 revised draft of Polling Place Identification Procedures under Proposition 200 (Exhibit 23 to Rodriguez Deposition)	Relevance/foundation
30.	July 7, 2005 letter from F. Ann Rodriguez to Janice K. Brewer re Procedure for Proof of Identification at Polls draft procedure of July 1, 2005 (Exhibit 24 to Rodriguez Deposition)	Relevance/foundation
31.	Pinal County Provisional Ballots	Relevance/hearsay/materiality/

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	documents (Exhibits 10 and 11 to Hoyos Deposition)	foundation/Rule 403
32.	VRAZ-II County Advisory Committee Issue 0056-Provisional Ballot Envelope (Exhibit 8 to Dean-Lytle Deposition)	Relevance/hearsay/materiality/foundation
33.	February 10, 2005 email from Craig Stender re MVD Match Return Codes and attached spreadsheet (Exhibit 9 to Dean-Lytle Deposition; Exhibit 8 to Wayman-Trujillo Deposition, Exhibit 22 to Rodriguez Deposition)	Relevance/materiality/foundation
34.	December 1, 2005 email from Laura Dean-Lytle re Deputizing for Presenting Identification and Locations (Exhibit 11 to Dean-Lytle Deposition)	Relevance/materiality/foundation
35.	March 31, 2005 e-mail from Judy Allen-Wise re FW: Uniformity (Exhibit 6 to Wayman-Trujillo Deposition)	Relevance/materiality/foundation
36.	VRAZ-II County Advisory Committee Issue 0009 – How long should counties wait for response back from registrants (Exhibit 9 to Wayman-Trujillo Deposition)	Relevance/hearsay/materiality/foundation
37.	Undated letter from Ana Wayman-Trujillo and Lynn Constabile to Joe Kanefield (Exhibit 10 to Wayman-Trujillo Deposition)	Relevance/materiality/foundation
38.	July 7, 2005 email from Bev Staddon re Please review 'Comments received regarding ID at the polls draft procedure' (Exhibit 11 to Wayman-Trujillo Deposition)	Relevance/materiality/foundation
39.	August 12, 2005 email from Ana Wayman-Trujillo re FW:	Relevance/materiality/foundation

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	Identification at the Polls Final Procedure (Exhibit 12 to Wayman-Trujillo Deposition)	
40.	Yavapai County Comments received regarding ID at the polls draft procedure (Exhibit 13 to Wayman-Trujillo Deposition)	Relevance/hearsay/materiality/foundation/Rule 403
41.	Yavapai County Provisional Ballot documents re 2006 Elections (Exhibit 14 to Wayman-Trujillo Deposition)	Relevance/hearsay/materiality/foundation/Rule 403
42.	February 4, 2005 email from Judy Allen-Wise re RE: Correction-Please Note (Exhibit 15 to Wayman-Trujillo Deposition)	Relevance/materiality/foundation
43.	July 22, 2005 email from Lynn Constabile re RE: ID at Polls Procedure - Draft Version 2 - Request for Comments (Exhibit 16 to Wayman-Trujillo Deposition)	
44.	Documents concerning voter registration of Gisela Nogales (Exhibit 9 to Marin Deposition (sealed))	Relevance/hearsay/materiality/foundation/Rule 403
45.	Yuma County Provisional Ballot documents (Exhibit A to Stallworth Deposition)	Relevance/hearsay/materiality/foundation/Rule 403
46.	Yuma County Provisional/Conditional Incoming and Outgoing Counts, November 7, 2006 General Election (Exhibit C to Stallworth Deposition)	Relevance/hearsay/materiality/foundation/Rule 403
47.	Yuma County Provisional Counts by Election (Exhibit D to Stallworth Deposition)	Relevance/hearsay/materiality/foundation/Rule 403
48.	Any and all Reports of Jorge Chapa, Richard Engstrom, Rodolfo Espino, Loius Lanier and Arturo Rosales, disclosed by the Gonzalez and	Relevance/hearsay/materiality/foundation/Rule 403

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	Navajo Nation Plaintiffs	
49.	Any exhibit identified in the Final Pretrial Disclosure Statement of any other party	Relevance/hearsay/materiality/foundation/Rule 403

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