

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES STUDENT ASSOCIATION, et al.,

Plaintiffs,

v.

TERRI LYNN LAND, et al.

Defendants.

CIVIL ACTION NO.

2:08-CV-14019-SJM-RSW

DECLARATION OF BRADLEY E. HEARD

I, BRADLEY E. HEARD, being of legal age and sound mind, do hereby depose and state as follows:

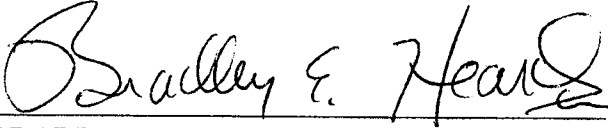
1. I am co-counsel for Plaintiffs in the above-captioned litigation. The facts to which I am testifying are based upon personal knowledge and are true and correct to the best of my knowledge, information, and belief.

2. Attached as Exhibit "A" to this Declaration are true and correct copies of correspondence between me and representatives of the Michigan Department of State, Bureau of Elections, concerning our requests earlier this year (2008) for the identities of individuals whose voter registrations were cancelled or rejected as a result of (a) the return of a voter registration applicant's original voter identification card as undeliverable and (b) the voter's application for a driver's license in a state other than Michigan, among other reasons.

The Department of State denied our requests for this information – certifying, pursuant to MCL § 15.235(4), that such records did not exist.

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

This 20th day of October, 2008.


BRADLEY E. HEARD