

# EXHIBIT 13

1 ANDREW P. THOMAS  
MARICOPA COUNTY ATTORNEY  
2 By: Colleen Connor(# 015679)  
Deputy County Attorney  
MCAO Firm No. 00032000

3 CIVIL DIVISION  
4 222 North Central Avenue, Suite 1100  
Phoenix, Arizona 85004-2206  
5 Telephone (602) 506-0128  
[connorc@mcao.maricopa.gov](mailto:connorc@mcao.maricopa.gov)

6 Dennis I. Wilenchik (# 05350)  
Kathleen Rapp (#023982)  
7 WILENCHIK AND BARTNESS, P.C.  
The Wilenchik & Bartness Building  
8 2810 North Third Street  
Phoenix, Arizona 85004  
(602) 606-2810  
9 [DIW@wb-law.com](mailto:DIW@wb-law.com); [kathleenr@wb.com](mailto:kathleenr@wb.com)  
10 Attorneys for Defendants La Paz County Recorder  
And Elections Director

11 IN THE UNITED STATES DISTRICT COURT  
12 FOR THE DISTRICT OF ARIZONA

13 MARIA M. GONZALES; JESUS M.  
GONZALES; BERNIE ABEYTIA;  
14 LUCIANO VALENCIA; DEBBIE LOPEZ,  
SOUTHWEST VOTER REGISTRATION  
15 EDUCATION PROJECT; VALLE DEL  
SOL; FRIENDLY HOUSE; CHICANOS  
16 POR LA CAUSA, INC.; and ARIZONA  
HISPANIC FORUM,

17 Plaintiffs,

18 v.

19 STATE OF ARIZONA, JAN BREWER, in  
20 her official capacity as the Secretary of State  
of the State of Arizona, et al.,

21 Defendants.  
22

No. CV06-1268-PHX ROS  
No. CV06-1362-PCT JAT

**ANSWERS TO FIRST SET OF  
INTERROGATORIES BY  
LA PAZ COUNTY RECORDER  
AND COUNTY ELECTIONS  
DIRECTOR**

1                    Defendants La Paz County Recorder and La Paz County Elections  
2 Director, by and through undersigned counsel, hereby submit the following Responses to  
3 Plaintiffs' First Set of Interrogatories.

4  
5 1. Identify each incident since January 1, 1996, in which (a) a non-United States  
6 citizen was alleged to have registered to vote in your county; (b) a non-United States  
7 citizen was alleged to have voted at a polling place in your county; (c) a non-United  
8 States citizen was alleged to have voted in your county by early ballot pursuant to A.R.S.  
9 § 16-542(A); and (d) an individual impersonated a registered voter at a polling place in  
your county. With respect to each such incident, please provide: (i) the name, last known  
address and telephone number of the individual and whether the individual was lawfully  
in the United States at the time of the incident; (ii) the date the individual was registered  
to vote and/or voted; and (iii) whether criminal charges were filed against the individual  
and, if so, the case caption, court, docket number and disposition.

10                    Answer: The La Paz County Defendants have no information regarding incidents  
11 described in Interrogatory #1.

12  
13 2. Identify all reports, studies or memoranda in the possession of your office  
14 that discuss or relate to the voting-related provisions of the Arizona Taxpayer and  
15 Citizen Protection Act ("ATCPA" or "the Act"), amending A.R.S. §§ 16-152, 16-166  
and 16-579, or the effect, impact or consequences of such provisions (including but not  
limited to any analysis of the number of individuals who lack an Arizona driver's license  
or the other forms of identification required by the Act).

16                    Answer: The La Paz County Defendants have no information regarding incidents  
17 described in Interrogatory #2.

18 3. Provide the total number of voter registration forms in your county that  
19 have been submitted since the date of implementation of the amendment to A.R.S. § 16-  
20 152 set forth in the ATCPA (requiring that voter registration forms contain proof of  
21 United States citizenship), and of that total number provide the number that were (i)  
22 accepted (*i.e.*, the applicant was registered), (ii) rejected due to the application form's  
failure to contain satisfactory proof of citizenship as required by Proposition 200, and  
(iii) rejected for reasons other than the application form's failure to contain proof of  
citizenship. If a breakdown of this information is available by month, and age, race and  
ethnicity of applicant, please provide that information.

1  
2        Answer: As of July 21, 2006, the total number of voter registration forms in La  
3 Paz County that have been submitted since January 24, 2005 is 1,341. The total number  
4 that were (i) accepted is 1,220; (ii) rejected due to the application form's failure to  
5 contain satisfactory proof of citizenship as required by Proposition 200 is 79, and (iii)  
6 rejected for reasons other than the application form's failure to contain proof of  
7 citizenship is 42.

8        4. State the total number of voters who were registered in your county on the  
9 effective date of the amendment to A.R.S. § 16-166 and who, pursuant to A.R.S. § 16-  
10 166(G), were deemed to have provided satisfactory evidence of citizenship and not  
11 required to resubmit evidence of citizenship unless changing voter registration from one  
12 county to another.

13        Answer: As of January 10, 2005, there were 7,285 active and 1,197 inactive  
14 registered voters in La Paz County. Due to cancellations, La Paz County is not able to  
15 extract the exact number of registered voters on the effective date, January 24, 2005.

16        5. For each election conducted in your county since the implementation of  
17 the voting-related provisions of the Arizona Taxpayer and Citizen Protection Act, please  
18 state the number of registered voters who (a) voted by mail; (b) cast a regular ballot at a  
19 polling place; (c) were not permitted to cast a regular ballot at a polling place due to the  
20 failure to provide identification required by A.R.S. § 16-579; (d) cast a provisional ballot  
21 due to the failure to provide identification required by A.R.S. § 16-579; (e) cast a  
22 provisional ballot and subsequently provided satisfactory proof of identification to the  
county recorder's office; and (f) cast a provisional ballot that was not counted due to  
failure to provide identification required by A.R.S. § 16-579. In addition, please identify  
any analyses, reports or studies in your possession that address the above.

23        Answer: For the March 14, 2006 election, (a) 32 registered voters voted by mail;  
24 (b) 283 cast a regular ballot at a polling place; (c) the number of individuals who were  
25 not permitted to cast a regular ballot at a polling place due to the failure to provide

1 identification required by A.R.S. § 16-579 is unknown; (d) 9 cast a provisional ballot  
2 due to the failure to provide identification required by A.R.S. § 16-579; (e) 9 cast a  
3 provisional ballot and subsequently provided satisfactory proof of identification to the  
4 county recorder's office; and (f) 0 cast a provisional ballot that was not counted due to  
5 failure to provide identification required by A.R.S. § 16-579.

6 For the May 16, 2006 election, (a) 43 registered voters voted by mail; (b) 223 cast  
7 a regular ballot at a polling place; (c) the number of individuals who were not permitted  
8 to cast a regular ballot at a polling place due to the failure to provide identification  
9 required by A.R.S. § 16-579 is unknown; (d) 0 cast a provisional ballot due to the failure  
10 to provide identification required by A.R.S. § 16-579; (e) 0 cast a provisional ballot and  
11 subsequently provided satisfactory proof of identification to the county recorder's office;  
12 and (f) 0 cast a provisional ballot that was not counted due to failure to provide  
13 identification required by A.R.S. § 16-579.

14 6. Identify the forms of identification that have been deemed acceptable by  
15 your county to establish the identity of electors in accordance with the requirements of  
A.R.S. § 16-579(A).

16 Answer: Acceptable forms of identification with photograph, name, and address  
17 of the elector are:

- 18
- Valid Arizona driver license
  - Valid Arizona nonoperating identification license
  - 19 • Tribal enrollment card or other form of tribal identification
  - 20 • Valid United States federal, state, or local government issued identification

21 An identification is "valid" unless it can be determined on its face that it has expired.

22 Acceptable forms of identification without a photograph that bear the name and address

1 of the elector (two required):

- 2 • Utility bill of the elector that is dated within ninety days of the date of the  
3 election. A utility bill may be for electric, gas, water, solid waste, sewer,  
4 telephone, cellular phone, or cable television
- 5 • Bank or credit union statement that is dated within ninety days of the date of the  
6 election
- 7 • Valid Arizona Vehicle Registration
- 8 • Indian census card
- 9 • Property tax statement of the elector's residence
- 10 • Tribal enrollment card or other form of tribal identification
- 11 • Vehicle insurance card
- 12 • Recorder's Certificate
- 13 • Valid United States federal, state, or local government issued identification,  
14 including a voter registration card issued by the county recorder.

15 7. Provide a breakdown of the number of voter registration applications  
16 submitted in your county since the date of implementation of the amendment to A.R.S. §  
17 16-152 (requiring that voter registration forms contain proof of United States  
18 citizenship), that were on (a) Arizona Voter Registration Forms, (b) Federal Mail Voter  
19 Registration Forms, and (c) other voter registration forms.

20 Answer: See Answer to Interrogatory to #3 for the number of voter registration  
21 forms submitted since the date of implementation of the amendment to A.R.S. § 16-152.

22 (a) La Paz County does not track the number of Arizona Voter Registration Forms as  
opposed to other types of forms, (b) La Paz County does not track the number of Federal  
Mail Voter Registration Forms as opposed to other types of forms, and (c) La Paz  
County does not track the type of forms submitted.

8. Provide the identity of individuals who submitted voter registration  
application forms in your county since the date of implementation of the amendment to  
A.R.S. § 16-152 whose applications were rejected due to the failure to provide  
satisfactory proof of citizenship as required by § 16-152.

Answer: A copy of the rejected voter registration forms is attached.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22

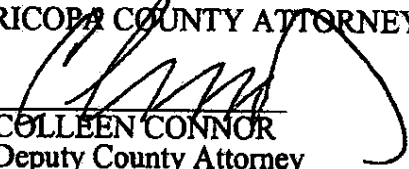
9. Provide the identity of voters registered to vote in your county who, since the implementation of the voting-related provisions of the Arizona Taxpayer and Citizen Protection Act, (a) were not permitted to cast a regular ballot at a polling place due to the failure to provide identification required by A.R.S. § 16-579; (b) cast a provisional ballot due to the failure to provide identification required by A.R.S. § 16-579; (c) cast a provisional ballot and subsequently provided satisfactory proof of identification to the county recorder's office; and (d) cast a provisional ballot that was not counted due to failure to provide identification required by A.R.S. § 16-579.

Answer: A copy of the Conditional Provisional Ballot envelopes are attached and identify the 9 registered voters who cast a provisional ballot due to the failure to provide identification required by A.R.S. § 16-579.

10. Identify each and every person whom you intend to call as a fact witness at the trial of this lawsuit or any other evidentiary hearing, including a hearing held pursuant to a motion for preliminary injunction, convened for the purpose of addressing the claims raised in plaintiffs' complaint.

Answer: La Paz County does not intend to call any fact witnesses.

DATED this 28<sup>th</sup> day of July 2006.

ANDREW P. THOMAS  
MARICOPA COUNTY ATTORNEY  
BY:   
COLLEEN CONNOR  
Deputy County Attorney  
Attorney for County Defendants

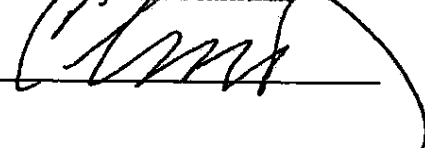
1 ORIGINAL of the foregoing mailed  
this 28<sup>th</sup> day of July, 2006 to:

2  
3 David B. Rosenbaum, Esq.  
4 Thomas L. Hudson, Esq.  
5 Sara S. Greene, Esq.  
6 OSBORNE MALEDON, P.A.  
7 2929 N. Central Ave., 21<sup>st</sup> Floor  
8 Phoenix, AZ 85012  
9 Attorneys for Plaintiffs

10 COPY of the foregoing mailed  
11 this 25<sup>th</sup> day of July, 2006 to:

12 David J. Bodney, Esq.  
13 Karen J. Hartman-Tellez, Esq.  
14 STEPTOE & JOHNSON LLP  
15 201 East Washington Street, Suite 1600  
16 Phoenix, AZ 85004  
17 Attorneys for Plaintiffs

18  
19  
20  
21  
22





# EXHIBIT 14



# NAVAJO COUNTY ELECTIONS SERVICES

*A Division of the Navajo County Board of Supervisors*



**Lisa McKee**  
Elections Coordinator


**KELLY R. DASTRUP**  
ELECTIONS DIRECTOR

**Nellie R. Hayes**  
Outreach Services Assistant

July 24, 2006

**NAVAJO COUNTY ELECTION SERVICES  
RESPONSE TO  
FIRST SET OF INTERROGATORIES  
FOR PLAINTIFFS  
INTER TRIBAL COUNCIL OF ARIZONA, INC., ET AL.**

1.
  - (a) Not applicable to Election Services Division
  - (b) None to the best of our knowledge
  - (c) Not applicable to Election Services Division
  - (d) None to the best of our knowledge
  
2. No studies/reports compiled or kept in Election Services  
Possible related supporting documentation contained in Request for Production #2
3. Not applicable to Election Services Division
4. Not applicable to Election Services Division
5.
  - (a) Provided by County Recorder
  - (b) March 2006 – Show Low USD Election: 766 ballots cast at polling place  
May 2006 – Heber-Overgaard Incorporation Election: 984 ballots cast at polling place
  - (c) Provided by County Recorder
  - (d) Provided by County Recorder
  - (e) Provided by County Recorder
  - (f) Provided by County Recorder
6. Supporting Documentation contained in Request for Production #3, 4, 5 & 6.
7. Not applicable to Election Services Division
8. Not applicable to Election Services Division
9. If applicable, provided by the County Recorder
10. Darlene Barton, Inspector – Show Low USD Election  
Mabel DeSpain, Inspector – Heber-Overgaard Incorporation Election

  
 Kelly R. Dastrup, Director  
 Navajo County Elections

**COUNTY RECORDER - NC 24**  
**NAVAJO COUNTY GOVERNMENTAL CENTER**

**LAURETTE JUSTMAN**  
RECORDER  
(928) 524-4190

100 E. Carter Dr.  
P.O. Box 668  
Holbrook, Arizona 86025-0668  
FAX: (928) 524-4308

**BARBARA L. HUNT**  
Chief Deputy Recorder  
(928) 524-4191

July 18,2006

**Interrogatories**

The following information is what our office has compiled.

1. We have no such incidents.
2. Our office does not have any analysis of the number of individuals who lack an Arizona Drivers License.
3. The number of forms accepted is 3,935. The number of forms rejected due to the application forms failure to contain satisfactory proof of citizenship is 175. The number of forms rejected for reasons other than the application forms failure to contain proof of citizenship is 65.
4. Total number of voters registered on the effective date of the amendment is 51,094.
5. A-Voted by mail in May 2005 is 217. March 2006 is 205  
B-Cast a regular ballot at a polling place- Elections Dept will answer.  
C-Not permitted to cast ballot due to failure to provide ID in May 2005 is 1 and March 2006 is 1.  
D-Cast a provisional ballot due to failure to provide ID in May 2005 is 1 and March 2006 is 1.  
E-cast a provisional ballot and provided ID to the Records Office in May 2005 is 1 and March 2006 is 1.  
F-0
6. See enclosed information.
7. Number of voter registration applications submitted in our county is 3,935. A,B And C we do not track.
8. See attached forms.
9. See attached forms.

# EXHIBIT 15

JUL 31 2006

1 ANDREW P. THOMAS  
 MARICOPA COUNTY ATTORNEY  
 2 By: Colleen Connor(# 015679)  
 Deputy County Attorney  
 MCAO Firm No. 00032000  
 3 CIVIL DIVISION  
 4 222 North Central Avenue, Suite 1100  
 Phoenix, Arizona 85004-2206  
 5 Telephone (602) 506-0128  
connorc@mcao.maricopa.gov

6 Dennis I. Wilenchik (# 05350)  
 Kathleen Rapp (#023982)  
 7 WILENCHIK AND BARTNESS, P.C.  
 The Wilenchik & Bartness Building  
 8 2810 North Third Street  
 Phoenix, Arizona 85004  
 (602) 606-2810  
 9 DIW@wb-law.com; kathleenr@wb.com  
 Attorneys for Defendants Maricopa County Recorder  
 10 And Elections Director

11 IN THE UNITED STATES DISTRICT COURT  
 12 FOR THE DISTRICT OF ARIZONA

13 MARIA M. GONZALES; JESUS M.  
 GONZALES; BERNIE ABEYTIA;  
 14 LUCIANO VALENCIA; DEBBIE LOPEZ,  
 SOUTHWEST VOTER REGISTRATION  
 15 EDUCATION PROJECT; VALLE DEL  
 SOL; FRIENDLY HOUSE; CHICANOS  
 16 POR LA CAUSA, INC.; and ARIZONA  
 HISPANIC FORUM,

17 Plaintiffs,

18 v.

19 STATE OF ARIZONA, JAN BREWER, in  
 20 her official capacity as the Secretary of State  
 of the State of Arizona, et al.,

21 Defendants.  
22

No. CV06-1268-PHX ROS  
 No. CV06-1362-PCT JAT

**ANSWERS TO FIRST SET OF  
 INTERROGATORIES BY  
 MARICOPA COUNTY  
 RECORDER AND COUNTY  
 ELECTIONS DIRECTOR**

1 Defendants Maricopa County Recorder Helen Purcell and Maricopa  
2 County Elections Director Karen Osborne, by and through undersigned counsel, hereby  
3 submit the following Responses to Plaintiffs' First Set of Interrogatories.

4  
5 1. Identify each incident since January 1, 1996, in which (a) a non-United States  
6 citizen was alleged to have registered to vote in your county; (b) a non-United States  
7 citizen was alleged to have voted at a polling place in your county; (c) a non-United  
8 States citizen was alleged to have voted in your county by early ballot pursuant to A.R.S.  
9 § 16-542(A); and (d) an individual impersonated a registered voter at a polling place in  
your county. With respect to each such incident, please provide: (i) the name, last known  
address and telephone number of the individual and whether the individual was lawfully  
in the United States at the time of the incident; (ii) the date the individual was registered  
to vote and/or voted; and (iii) whether criminal charges were filed against the individual  
and, if so, the case caption, court, docket number and disposition.

10 Answer: With the exception of privileged materials, all documents related to the  
11 above-related incidents have been produced in Response to the Request For Production  
12 of Documents #1 through 4.

13  
14 2. Identify all reports, studies or memoranda in the possession of your office  
15 that discuss or relate to the voting-related provisions of the Arizona Taxpayer and  
16 Citizen Protection Act ("ATCPA" or "the Act"), amending A.R.S. §§ 16-152, 16-166  
and 16-579, or the effect, impact or consequences of such provisions (including but not  
limited to any analysis of the number of individuals who lack an Arizona driver's license  
or the other forms of identification required by the Act).

17 Answer: All reports, studies, or memoranda have been produced in Response to  
18 the Request For Production of Documents #5.

19  
20 3. Provide the total number of voter registration forms in your county that  
21 have been submitted since the date of implementation of the amendment to A.R.S. § 16-  
22 152 set forth in the ATCPA (requiring that voter registration forms contain proof of  
United States citizenship), and of that total number provide the number that were (i)  
accepted (*i.e.*, the applicant was registered), (ii) rejected due to the application form's  
failure to contain satisfactory proof of citizenship as required by Proposition 200, and

1 (iii) rejected for reasons other than the application form's failure to contain proof of  
2 citizenship. If a breakdown of this information is available by month, and age, race and  
ethnicity of applicant, please provide that information.

3 Answer: As of July 13, 2006, the total number of voter registration forms in  
4 Maricopa County that have been submitted since January 24, 2005 is 118,209 over the  
5 counter or by mail and 323,311 from Service Arizona that pass electronically. The total  
6 number provide the number that were (i) accepted is 103,119 of the over the counter or  
7 by mail voter registration and 323,311 from Service Arizona electronic pass; (ii) rejected  
8 due to the application form's failure to contain satisfactory proof of citizenship as  
9 required by Proposition 200 is 15,090, and (iii) rejected for reasons other than the  
10 application form's failure to contain proof of citizenship is zero. The breakdown of this  
11 information is available by month for the forms submitted over the counter or by mail,  
12 which is attached as Exhibit A.

13  
14 4. State the total number of voters who were registered in your county on the  
15 effective date of the amendment to A.R.S. § 16-166 and who, pursuant to A.R.S. § 16-  
166(G), were deemed to have provided satisfactory evidence of citizenship and not  
16 required to resubmit evidence of citizenship unless changing voter registration from one  
17 county to another.

18 Answer: As of January 24, 2005, there were 1,599,412 active and 111,419  
19 inactive registered voters in Maricopa County.

20 5. For each election conducted in your county since the implementation of  
21 the voting-related provisions of the Arizona Taxpayer and Citizen Protection Act, please  
22 state the number of registered voters who (a) voted by mail; (b) cast a regular ballot at a  
polling place; (c) were not permitted to cast a regular ballot at a polling place due to the  
failure to provide identification required by A.R.S. § 16-579; (d) cast a provisional ballot  
due to the failure to provide identification required by A.R.S. § 16-579; (e) cast a  
provisional ballot and subsequently provided satisfactory proof of identification to the

1 county recorder's office; and (f) cast a provisional ballot that was not counted due to  
2 failure to provide identification required by A.R.S. § 16-579. In addition, please identify  
any analyses, reports or studies in your possession that address the above.

3 Answer: For the March 14, 2006 election, (a) 71,306 registered voters voted by  
4 mail; (b) 39,496 cast a regular ballot at a polling place; (c) the number of persons who  
5 were not permitted to cast a regular ballot at a polling place due to the failure to provide  
6 identification required by A.R.S. § 16-579 is unknown; (d) 177 cast a provisional ballot  
7 due to the failure to provide identification required by A.R.S. § 16-579; (e) 62 cast a  
8 provisional ballot and subsequently provided satisfactory proof of identification to the  
9 county recorder's office; and (f) 115 cast a provisional ballot that was not counted due to  
10 failure to provide identification required by A.R.S. § 16-579.

11 For the May 16, 2006 election, (a) 70,670 registered voters voted by mail; (b)  
12 35,752 cast a regular ballot at a polling place; (c) the number of persons who were not  
13 permitted to cast a regular ballot at a polling place due to the failure to provide  
14 identification required by A.R.S. § 16-579 is unknown; (d) 130 cast a provisional ballot  
15 due to the failure to provide identification required by A.R.S. § 16-579; (e) 58 cast a  
16 provisional ballot and subsequently provided satisfactory proof of identification to the  
17 county recorder's office; and (f) 72 cast a provisional ballot that was not counted due to  
18 failure to provide identification required by A.R.S. § 16-579.

19 6. Identify the forms of identification that have been deemed acceptable by  
20 your county to establish the identity of electors in accordance with the requirements of  
A.R.S. § 16-579(A).

21 Answer: Acceptable forms of identification with photograph, name, and address  
22 of the elector are:

- 1 • Valid Arizona driver license
- 2 • Valid Arizona nonoperating identification license
- 3 • Tribal enrollment card or other form of tribal identification
- 4 • Valid United States federal, state, or local government issued identification

5 An identification is "valid" unless it can be determined on its face that it has expired.

6 Acceptable forms of identification without a photograph that bear the name and address  
7 of the elector (two required):

- 8 • Utility bill of the elector that is dated within ninety days of the date of the  
9 election. A utility bill may be for electric, gas, water, solid waste, sewer,  
10 telephone, cellular phone, or cable television
- 11 • Bank or credit union statement that is dated within ninety days of the date of the  
12 election
- 13 • Valid Arizona Vehicle Registration
- 14 • Indian census card
- 15 • Property tax statement of the elector's residence
- 16 • Tribal enrollment card or other form of tribal identification
- 17 • Vehicle insurance card
- 18 • Recorder's Certificate
- 19 • Valid United States federal, state, or local government issued identification,  
20 including a voter registration card issued by the county recorder or mail identified  
21 as "Election Mail".

22 7. Provide a breakdown of the number of voter registration applications  
submitted in your county since the date of implementation of the amendment to A.R.S. §  
16-152 (requiring that voter registration forms contain proof of United States  
citizenship), that were on (a) Arizona Voter Registration Forms, (b) Federal Mail Voter  
Registration Forms, and (c) other voter registration forms.

Answer: Since the date of implementation of the amendment to A.R.S. § 16-152,  
the breakdown of the number of voter registration forms submitted is as follows: (a)  
118,209 Arizona Voter Registration Forms, (b) 81 Federal Mail Voter Registration  
Forms, and (c) 323,311 Service Arizona registrations and 622 Federal Post Card  
Application registrations.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22

8. Provide the identity of individuals who submitted voter registration application forms in your county since the date of implementation of the amendment to A.R.S. § 16-152 whose applications were rejected due to the failure to provide satisfactory proof of citizenship as required by § 16-152.

Answer: The identity of those individuals has been disclosed in Response to Plaintiffs' Gonzales, et al. Request For Production of Documents #1.

9. Provide the identity of voters registered to vote in your county who, since the implementation of the voting-related provisions of the Arizona Taxpayer and Citizen Protection Act, (a) were not permitted to cast a regular ballot at a polling place due to the failure to provide identification required by A.R.S. § 16-579; (b) cast a provisional ballot due to the failure to provide identification required by A.R.S. § 16-579; (c) cast a provisional ballot and subsequently provided satisfactory proof of identification to the county recorder's office; and (d) cast a provisional ballot that was not counted due to failure to provide identification required by A.R.S. § 16-579.

Answer: The identity of persons who cast a provisional ballot due to the failure to provide identification required by A.R.S. § 16-579 is attached as Exhibit B. Due to the expedited time frame, the list has not been compared with the County's voter registration records to determine whether the persons identified were registered voters at the time of the election. The column "DP" identifies: persons who (c) cast a provisional ballot and subsequently provided satisfactory proof of identification to the county recorder's office with the letter "Y"; and (d) cast a provisional ballot that was not counted due to failure to provide identification required by A.R.S. § 16-579 with the letter "N".

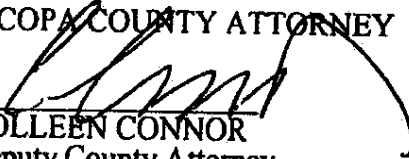
10. Identify each and every person whom you intend to call as a fact witness at the trial of this lawsuit or any other evidentiary hearing, including a hearing held pursuant to a motion for preliminary injunction, convened for the purpose of addressing the claims raised in plaintiffs' complaint.

Answer: Karen Osborne, Maricopa County Elections Director; Amy Putman,

1 Voter Registration Manager, Maricopa County Elections Department; Tammy Patrick,  
2 Federal Compliance Officer, Maricopa County Elections Department.

3  
4 DATED this 26<sup>th</sup> day of July 2006.

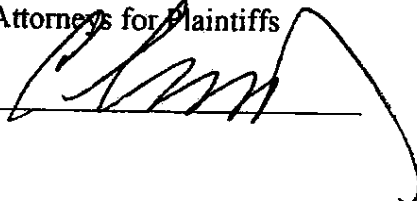
5  
6 ANDREW P. THOMAS  
MARICOPA COUNTY ATTORNEY

7 BY:   
8 COLLEEN CONNOR  
Deputy County Attorney  
Attorney for County Defendants

9  
10 COPY of the foregoing e-mailed  
11 this 26<sup>th</sup> day of July, 2006 to:

12 David B. Rosenbaum, Esq.  
13 Thomas L. Hudson, Esq.  
Sara S. Greene, Esq.  
14 OSBORNE MALEDON, P.A.  
2929 N. Central Ave., 21<sup>st</sup> Floor  
15 Phoenix, AZ 85012  
Attorneys for Plaintiffs

16  
17 David J. Bodney, Esq.  
Karen J. Hartman-Tellez, Esq.  
18 STEPTOE & JOHNSON LLP  
201 East Washington Street, Suite 1600  
19 Phoenix, AZ 85004  
Attorneys for Plaintiffs

20   
21  
22



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22

VERIFICATION

STATE OF ARIZONA     )  
                                  )     ss.  
County of Maricopa     )

Karen Osborne, being first duly sworn upon my oath, deposes and says:

That she is the Maricopa County Director of Elections and is authorized to make this verification.

That she has read the Answers to First Set of Interrogatories By Maricopa County Recorder and County Elections Director to which this verification is attached, and that she knows the contents thereof to be true and correct and to the best of her own knowledge or information, except as to those matters and things therein alleged upon information and belief, or provided with assistance of counsel, and as to those matters she believes them to be true.

DATED this 26<sup>th</sup> day of July 2006.

*Karen Osborne*

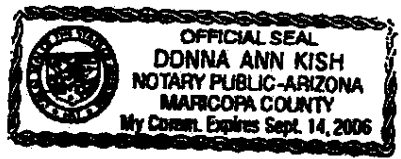
Karen Osborne  
Maricopa County Elections Director

SUBSCRIBED AND SWORN to before me this 26<sup>th</sup> day of July, 2006.

*Donna Ann Kish*

NOTARY PUBLIC

My Commission Expires:



# 2005 - DAILY VOTER REGISTRATIONS - PROPOSITION 200

NEW	MOD	DL#S	NO DOC	AUTH	SUSP DOB	SUSP CIT	SUSP RES	SUSP DL	SUSP SIG	SUSP YNG	INS #
45	77	7	38								
79	134	12	67								
100	128	31	69								
84	147	32	52								
85	49	28	46		1	10					
70	107	18	50		2	2					
44	69	5	38	1							
87	42	24	55	8							
137	46	56	77								
98	78	35	52	11							
158	78	61	84	13							
76	59	17	56	3	2	4	3				
126	84	57	67	2							
182	73	48									
259	141	84	107								
121	67	55	60	68							
109	69	59	41	9	1	14	1	11			
88	54	41	41	6	1	2					
122	46	31	29	62							
171	71	97	63	11							
113	182	75	99	8							
132	56	70	61	1							
132	39	35	39	58	2	21	1	21	1		
101	65	48	44	9							
141	70	70	62	9							
73	49	30	38	5	1	10	1	17			
106	33	53	49	4							
244	35	58	122	64	1	8	2	8	1		
103	73	53	45	5							
179	262	90	77	12							
74	100	40	29	5							
90	61	35	50	5							
144	56	40	44	60	1	22	3	5	7		
121	92	62	55	4							
116	82	57	49	10							

# 2005 - DAILY VOTER REGISTRATIONS - PROPOSITION 200

NEW	MOD	DL#S	NO DOC	AUTH	SUSP DOB	SUSP CIT	SUSP RES	SUSP DL	SUSP SIG	SUSP YNG	INS #
3-Mar	58	55	56	5	1	13	5	1			
7-Mar	53	35	59	7			4				
3-Mar	49	35	20	71							
1-Mar	44	36	45	2							
3-Mar	107	91	80	13							
3-Mar	60	35	53	2	1	21	2				
1-Mar	33	28	36	3	1	4	2				
3-Mar	41	29	20	3			2				
3-Mar	90	53	69	7							
3-Mar	62	33	47	9	1						
3-Mar	35	32	32	4		12		13			
1-Mar	51	55	61	1							
Apr	78	47	36	68		9		6			
Apr	65	36	20	9							
Apr	87	81	76	14		6		6			
Apr	52	32	44	6		3					
Apr	93	65	94	8	1	11					1
Apr											
1-Apr	144	87	56	3		13					
2-Apr	47	37	41	4		.17					
3-Apr	77	51	58	9					1		
1-Apr	83	77	62			2		2			
3-Apr	126	102	138	56							
3-Apr	89	69	78	15							
3-Apr	77	31	28	9	1	16			3		2
3-Apr	75	69	101	6		7				2	
1-Apr	39	48	30	3	3	4					
2-Apr	67	39	81	70							
3-Apr	56	35	35	4							
3-Apr	83	41	36	15							
7-Apr	57	41	37	10	1	22			2		4
3-Apr	50	59	40	3							
3-Apr	50	51	41	60		4					
May	67	33	32	3							16
May	99	78	89	25							

# 2005 - DAILY VOTER REGISTRATIONS - PROPOSITION 200

NEW	MOD	DL#S	NO DOC	AUTH	SUSP DOB	SUSP CIT	SUSP RES	SUSP DL	SUSP SIG	SUSP YNG	INS #
May 96	44	40	50	6				1			
May 115	115	57	55	3	13						
May 126	39	43	34	49	3						
May 117	76	38	68	11							
May 223	67	57	155	11							
May 70	36	29	41		11	2		1			
May 138	59	68	59		9	1					
May 163	82	73	80		1	3					
May 133	49	58	68	10	6						
May 91	92	42	40	7							
May 100	73	56	40	9							
May 191	86	54	83	4							
May 133	79	53	74	54							
May 90	57	52	32	6							
May 88	41	33	44	5							
May 70	34	29	32	9	2	8	45	1			1
May 111	42	46	36	9	5	6	6				2
May 167	79	83	73	29							
Jun 91	91	58	32	11	7	2	5				
Jun 111	50	70	34	1	16	3	3				
Jun 138	3	35	52	7	6		2				
Jun 97	61	51	34	50							
Jun 148	59	51	88	12							
Jun 69	42	26	34	9							
Jun 86	24	38	42	9							
Jun 151	59	47	47	6							
Jun 104	62	45	45	57							
Jun 141	73	115	19	14							
Jun 105	68	34	61	7							
Jun 85	46	41	40	10	9	3	13				1
Jun 185	52	49	83	4	3	3	4				
Jun 86	51	50	34	53							
Jun 101	65	39	53	2	7	1	4				
Jun 20	4	4	14	9	8	1	5				
				2	3	1					

# 2005 - DAILY VOTER REGISTRATIONS - PROPOSITION 200

NEW	MOD	DL#S	NO DOC	AUTH	SUSP DOB	SUSP CIT	SUSP RES	SUSP DL	SUSP SIG	SUSP YNG	INS #
3-Jun	94	98	76	8	1		2				
1-Jun	46	50	55	56							
7-Jun	58	36	58	8	8	1	5	1		1	
3-Jun	89	43	38	8	2	1	12	1			
3-Jun	53	37	35	8	6	1					
3-Jun	54	47	46	4	4		4				
Jul	81	51	23	7	3	1					
Jul	254	146	103	5	2		3				
Jul	117	65	46	6	1		4				
Jul	102	40	44	5	15	1	4				
Jul	186	53	44	5	6		4				
1-Jul	144	155	26	5	1						
3-Jul	113	47	92	5	13		11				2
3-Jul	89	78	28	7							
1-Jul	52	34	53	2	16	1	6				
3-Jul	73	87	86	8							
3-Jul	74	163	64	4	14	2	22	1			
3-Jul	67	36	22	9	3						
3-Jul	169	92	89	15							
3-Jul	52	55	66	4	20	1	5	1			
1-Jul	64	44	22	7							
3-Jul	90	178	101	7							
3-Jul	66	36	52	19	17	3	17	3			
3-Jul	82	91	64	17							
3-Jul	49	37	69	6							
3-Jul	85	35	44	6							
3-Jul					1	5	4				
Aug	62	126	49	1							
Aug	72	83	38	75							
Aug	131	72	57	2							
Aug	95	62	27	6							
Aug	246	139	36	71			5				
Aug	162	80	71	11			6				
May	143	80	58	5							
3-Aug	174	79	91	4							
11-Aug	95	75	33	8			2				

# 2005 - DAILY VOTER REGISTRATIONS - PROPOSITION 200

NEW	MOD	DL#S	NO DOC	AUTH	SUSP DOB	SUSP CIT	SUSP RES	SUSP DL	SUSP SIG	SUSP YNG	INS #
12-Aug 218	91	134	40	44		36					
15-Aug 161	131	90	55	16		29	19				
16-Aug 92	84	51	30	11			12				
17-Aug 177	80	90	85	2			7				
18-Aug 110	50	50	58	2			3				
19-Aug 272	86	170	27	75							
22-Aug 220	117	109	103	8		24	4	5			
23-Aug 190	110	94	85	11							
24-Aug 144	54	74	61	9							
25-Aug 120	49	72	39	9							
26-Aug 449	171	332	58	81							
29-Aug 160	97	106	49	5	5	46	2	25	3		
30-Aug 147	60	93	46	8							
31-Aug 112	60	66	32	14							
1-Sep 139	62	98	35	6							
2-Sep 397	158	236	102	59							
6-Sep 165	79	120	40	5							
7-Sep 136	106	75	46	15							
8-Sep 225	116	146	77	2							
9-Sep 273	77	91	105	77			32				
12-Sep 87	79	65	18	3	3						
13-Sep 111	87	68	27	16			12			4	
14-Sep 122	59	85	33	4							
15-Sep 108	60	57	42	9							
16-Sep 332	138	289	35	8							
19-Sep 124	109	98	19	7							
20-Sep 273	173	143	123	7							
21-Sep 187	91	102	79	6						36	5
22-Sep 144	56	87	46	11							
23-Sep 274	118	163	41	70							
26-Sep 150	141	86	57	7							
27-Sep 198	186	131	44	23							
28-Sep 95	52	62	19	14							
29-Sep 215	100	151	57	7							
30-Sep 161	79	144	13	4							

# 2005 - DAILY VOTER REGISTRATIONS - PROPOSITION 200

NEW	MOD	DL#S	NO DOC	AUTH	SUSP DOB	SUSP CIT	SUSP RES	SUSP DL	SUSP SIG	SUSP YNG	INS #
3-Oct 64	74	38	13	13							
4-Oct 194	135	112	65	17							
5-Oct 144	41	88	47	9							
6-Oct 101	66	72	19	10							
7-Oct											
10-Oct											
11-Oct 499	231	346	101	52							
12-Oct 246	178	199	34	13							38
13-Oct 176	131	130	33	13							
14-Oct 219	97	124	41	54							
17-Oct 160	119	86	66	6							
18-Oct 307	168	247	50	10							
19-Oct 160	128	98	50	12							
20-Oct 230	118	175	43	12							
21-Oct 352	178	248	42	62							
24-Oct 86	80	58	23	5							
25-Oct 438	272	293	116	29							37
26-Oct 112	121	78	30	4							
27-Oct 115	119	75	36	4							
28-Oct 486	192	343	85	58							
31-Oct 211	210	139	60	12							
1-Nov 88	142	71	13	4							
2-Nov 100	115	73	25	2							
3-Nov 166	148	132	28	6							
4-Nov 163	208	171	32	5							
7-Nov 237	180	147	27	6							
8-Nov 160	132	87	44	1							
9-Nov 105	123	87	33	3							
10-Nov 214	162	175	38	1							
14-Nov 191	314	138	42	11							
15-Nov 375	352	290	77	8							
16-Nov 282	161	224	52	6							
17-Nov 97	157	136	16	5							
18-Nov 114	166	101	11	54							
21-Nov 160	196	123	68	5							

# 2005 - DAILY VOTER REGISTRATIONS - PROPOSITION 200

NEW	MOD	DL#S	NO DOC	AUTH	SUSP DOB	SUSP CIT	SUSP RES	SUSP DL	SUSP SIG	SUSP YNG	INS #
22-Nov 136	70	51	15	4							
23-Nov 64	112	41	20	3							
25-Nov 25	39	14	10	1							
28-Nov 49	131	35	12	2							
29-Nov 161	238	126	29	6							
30-Nov 86	106	68	18								
1-Dec 79	86	59	17	3							
2-Dec 195	104	120	23	52							
5-Dec 62	209	48	9	5							
6-Dec 42	247	29	11	2							
7-Dec 39	129	22	12	5							
8-Dec 136	108	103	32	4							
9-Dec 195	207	101	22	72							
12-Dec 178	334	131	43	4							
13-Dec 143	342	108	30	5							
14-Dec 3	154	2		1							
15-Dec 33	201	28	3	2							
16-Dec 88	120	56	25	1							
19-Dec 46	99	30	15	1							
20-Dec 89	84	70	19								
21-Dec 33	69	22	10	1							
22-Dec 119	360	71	40	8							
23-Dec 63	204	47	15	1							
28-Dec 2	519	2		1							
29-Dec 65	434	36	24	5							
30-Dec 63	279	49	24	4							
<b>TOTAL</b>	<b>32420</b>	<b>23263</b>	<b>1197</b>	<b>3230</b>	<b>46</b>	<b>706</b>	<b>84</b>	<b>629</b>	<b>27</b>	<b>4</b>	<b>6</b>

35% new registrations are rejected for insufficient proof of citizenship

10% new registrations are received with proper documentation other than the DLN

## 2006 - DAILY VOTER REGISTRATIONS - PROPOSITION 200

	NEW	MOD	DL#S	NO DOC	AUTH
3-Jan	139	235	111	25	3
4-Jan	29	216	12	12	5
5-Jan	206	284	155	47	4
6-Jan	115	162	38	9	68
9-Jan	429	398	373	49	7
10-Jan	110	267	90	18	2
11-Jan	108	232	79	28	3
12-Jan	25	213	17	4	3
13-Jan	138	309	56	11	71
17-Jan	102	340	83	15	4
18-Jan	67	482	47	12	8
19-Jan	73	350	49	13	11
20-Jan	187	150	100	25	62
23-Jan	136	194	102	25	9
24-Jan	64	546	45	13	6
25-Jan	59	99	47	10	2
26-Jan	86	400	60	19	3
27-Jan	148	235	69	12	74
30-Jan	98	321	82	8	9
31-Jan	127	454	106	16	5
1-Feb	155	128	130	23	2
2-Feb	97	267	72	17	8
3-Feb	162	450	88	21	8
6-Feb	139	195	59	16	64
7-Feb	76	847	60	11	5
8-Feb	80	594	54	25	1
9-Feb	263	1362	140	50	73
10-Feb	82	437	71	10	1
13-Feb	4	110	3	1	
14-Feb	62	582	51	8	3
15-Feb	105	215	79	21	5
16-Feb	22	751	12	3	7
17-Feb	127	539	84	30	13
20-Feb	173	437	111	26	36
21-Feb	99	555	63	28	8
23-Feb	130	597	112	14	4
24-Feb	99	263	19	9	
27-Feb	130	321	69	10	51
28-Feb	121	307	92	27	2
1-Mar	45	134	33	11	1
2-Mar	102	404	70	11	12
3-Mar	71	148	56	5	2
6-Mar	181	258	67	39	70
7-Mar	193	230	156	23	7
8-Mar	90	295	70	18	2
9-Mar	246	238	202	30	3
10-Mar	74	101	58	8	
13-Mar	186	266	94	17	46
14-Mar	127	150	98	16	12
17-Mar	163	428	116	27	11
20-Mar	167	205	79	17	63
21-Mar	158	298	108	31	9
22-Mar	96	229	74	9	6

23-Mar	62	139	35	11	1
24-Mar	85	130	60	13	6
27-Mar	191	210	107	16	58
28-Mar	82	119	42	3	6
29-Mar	119	122	79	32	1
30-Mar	24	74	3		4
31-Mar	136	97	77	34	5
3-Apr	121	578	91	15	9
4-Apr	120	448	81	17	3
5-Apr	107	656	82	20	
6-Apr	63	59	49	4	
7-Apr	44	607	34	5	
10-Apr	116	486	74	21	50
11-Apr	124	451	84	13	6
12-Apr	62	306	38	10	3
14-Apr	350	300	220	51	
15-Apr	1518	1243	1213	221	73
18-Apr	244	424	193	25	6
19-Apr	925	615	422	78	6
20-Apr	478	344	413	58	1
21-Apr	502	462	423	57	3
22-Apr	332	380	262	53	9
24-Apr	72	75	52	14	2
25-Apr	59	274	40	8	2
26-Apr	99	368	72	10	6
27-Apr	70	163	43	11	4
28-Apr	46	154	35	8	2
1-May	113	109	28	8	53
2-May	48	139	30	8	3
3-May	119	226	82	12	6
4-May	54	56	40	5	3
5-May	68	170	39	9	6
8-May	191	206	102	18	53
9-May	106	80	70	17	3
10-May	127	268	94	15	6
11-May	64	117	45	11	3
12-May	136	178	43	11	52
15-May	119	283	86	17	7
16-May	171	257	107	39	9
19-May	171	206	157	38	6
22-May	136	186	101	19	6
23-May	88	80	71	8	8
24-May	149	317	97	22	6
25-May	55	31	38	11	1
26-May	67	180	47	9	3
30-May	68	93	29	9	22
31-May	105	108	77	14	3
1-Jun	85	502	52	8	0
2-Jun	136	331	85	27	5
5-Jun	133	98	52	16	54
6-Jun	108	451	67	18	4
7-Jun	565	642	319	43	13
8-Jun	238	403	172	43	7
9-Jun	68	124	44	17	5
12-Jun	135	422	37	9	63
14-Jun	318	529	230	44	11

15-Jun	119	274	75	27	11
16-Jun	541	524	317	132	4
19-Jun	838	684	622	160	29
20-Jun	822	476	640	121	28
21-Jun	247	432	146	72	14
22-Jun	43	139	28	6	3
23-Jun	638	378	478	93	7
26-Jun	66	133	36	16	7
27-Jun	68	89	44	13	4
28-Jun	52	81	40	5	4
30-Jun	130	350	86	12	18
5-Jul	501	494	207	67	43
7-Jul	812	512	581	127	67
10-Jul	494	360	145	242	70
11-Jul	497	63	146	319	6
12-Jul	183	188	123	36	9
13-Jul	262	169	95	129	6
14-Jul					
17-Jul					
18-Jul					
19-Jul					
20-Jul					
21-Jul					
24-Jul					
25-Jul					
26-Jul					
27-Jul					
28-Jul					
31-Jul					
1-Aug					
2-Aug					
3-Aug					
4-Aug					
7-Aug					
8-Aug					
9-Aug					
10-Aug					
11-Aug					
<b>TOTAL</b>	<b>22876</b>	<b>39650</b>	<b>14945</b>	<b>3893</b>	<b>1911</b>

17% new registrations are rejected for insufficient proof of citizenship

8% new registrations are received with proper documentation other than the DLN

March 2006

NAME	HELEN	3111 N LOS ALTOS	DR	CHANDLER	85224	N
AKIYAMA	HELEN	3111 N LOS ALTOS	DR	CHANDLER	85224	N
ALLES	ALLEN	7470 E DE LA O	RD	SCOTTSDALE	85255	N
ALLRED	EVAN	404 E KIMBALL	AVE	MESA	85204	N
ALLRED	WADE	1015 S VAL VISTA	DR	71 MESA	85204	N
AZAD	DE ANDREA	4520 E DOUGLAS	AVE	HIGLEY	85236	N
BACA	ANN	12040 S POTOMAC	ST	PHOENIX	85044	N
BARNEWOLT	E	8229 E JUAN TABO	RD	SCOTTSDALE	85255	N
BARTOLINI	MICHAEL	19034 N 94TH	WAY	SCOTTSDALE	85255	N
BASSETT	M	99 E SILVER CREEK	RD	GILBERT	85296	Y
BAUTISTA	DUTTON	1933 E DUKE	DR	TEMPE	85283	N
BEDIENT	J	308 E BALBOA	DR	TEMPE	85282	N
BENTLER	MARIE	8821 N 85TH	PL	SCOTTSDALE	85268	Y
BORCHERT	LOUGHNAN	8344 W PARADISE	DR	PEORIA	85345	Y
BOSELL	JOSEPH	12000 N 90TH	DR	2010 SCOTTSDALE	85260	Y
BRENNAN	HOMER	5261 S DEBORAH	ST	TEMPE	85283	N
BRINKLEY	MARIE	1523 W MUSKET	DR	CHANDLER	85248	N
BROWN	NICOLE	15415 E GREYSTONE	WAY	FTN HILLS	85268	N
BROWN	LYNN	6614 N 19TH	AVE	PHOENIX	85015	Y
BRUNDAGE	HOWARD	3175 N PRICE	RD	CHANDLER	85224	N
BURNS	LOUISE	1910 MANRAD	RD	WICKENBURG	85390	Y
BURRIE	ANN	1120 W KATHLEEN	RD	PHOENIX	85023	N
BUSCH	BRYANT	6607 E 1ST	AVE	SCOTTSDALE	85251	N
BUSHOR	LEA	521 W SUMMIT	PL	CHANDLER	85225	Y
CAIRNS	MILDRED	2122 E KIRKLAND	LN	4 TEMPE	85281	N
CARLSON	OSCEOLA	2044 W SMOKETREE	DR	WICKENBURG	85390	Y
CHAUDHURI	RAYMOND	1201 W 12TH	PL	TEMPE	85281	N
CHURCHILL	MYRON	12000 N 90TH	ST	SCOTTSDALE	85260	N
COHEN	ANNE	8355 E SAN ROSENDO	DR	SCOTTSDALE	85258	N
CORZO	M	15844 S 17TH	DR	PHOENIX	85045	N
CORZO	F	3869 S EMERALD	DR	BUCKEYE	85326	Y
COSTELLO	JEAN	8030 W VARNEY	RD	PEORIA	85345	N
COTA	CUEVA	1333 W THOMPSON	WAY	CHANDLER	85248	N
COTA	DALE	306 S 7TH	ST	605 BUCKEYE	85326	Y
COX	PERES	661 E STOTTLER	DR	GILBERT	85296	Y
COX		1626 E PALMCROFT	DR	TEMPE	85282	N
COX		4531 E ASPEN	WAY	HIGLEY	85236	N
CRAFT						
CRISPIN						

Exhibit B

March 2006

CRISPIN	ROBERT	REA	4531 E	ASPEN	WAY	85236	N
DAMIAN	ELIZABETH	ENRIQUEZ	840 N	OLYMPIC	DR	85236	N
D'ASTICI	KERRI	SAVAGE	764 E	AQUARIUS	PL	85248	N
DE MARCO	KAREN	JENNIFER	1443 S	BRENTWOOD	CT	85248	N
DELOSSANTOS	FEDERICO	E	1103 N	POPLAR	DR	85226	N
DE THERAGE	CARMEN	LAURENCIA	4072 E	WESTCHESTER	DR	85249	N
DIBONA	HEATHER	EVE	3402 N	62ND	PL	85251	N
DIGIACOMO	QUINT	ALLEN	11460 E	CAVEDALE	DR	85262	Y
DONALDSON	JAMES	RICHARD	15418 E	STARDUST	DR	85268	N
DUANE	DAVID	KAY	1069 W	RAVEN	DR	85248	N
DUCLOS	MELINDA	C	11260 E	POINSETTIA	DR	85259	N
DUDEK	JOANNE	GRACE	6360 S	PEBBLE BEACH	CHANDLER	85248	N
EGGER	KATHERINE	MARIE	9037 W	TONOPAH	CHANDLER	85382	Y
ELLIOTT	KIMBERLY	MICHAEL	4439 E	INDIAN WELLS	CHANDLER	85249	Y
ESPARZA	JOHNNIE	PENA	632 S	72ND	MESA	85208	N
ESPINOSA	CRISELIO	P	505 E	SOUTH	BUCKEYE	85326	N
FARNER	SHIRLEY	A	5823 E	MONTARA	MESA	85215	N
FARRELL	VALERIE	ELAINE	4038 E	LIBRA	HIGLEY	85236	N
FELDMAN	MARTIN	A	14000 N	94TH	2155 SCOTTSDALE	85260	N
FLUHR	EMILY	ELAINE	5731 E	GLADE	MESA	85206	N
FORAKER	SHEILA	A	7138 E	BAYWOOD	MESA	85208	N
FORK	SUE	CAROL	1635	CAMINO	WICKENBURG	85390	Y
FORK	WILLIAM	L	1635	LAZY FOX	WICKENBURG	85390	Y
FOSTER	ROSALIE	CONSTANCE	8712 E	SAN VICTOR	SCOTTSDALE	85258	Y
GALLEGOS	GLORIA	ANTONIO	10978 E	PALOMINO	SCOTTSDALE	85259	Y
GARCIA	MARCO	A	2622 N	61ST	PHOENIX	85035	N
GERMANN	EDWARD	FREDERICK	4541 E	SHOMI	PHOENIX	85044	N
GILL	GLENN	RUTH	623	NORTH HEIGHTS	WICKENBURG	85390	N
GORDON	THOMAS	E	4264 E	HOPE	MESA	85205	N
GRAHAM	GERTRUDE	M	1527 E	HUDSON	TEMPE	85281	Y
GRANSEE	ANN	D	3947 E	EMELITA	MESA	85206	Y
GUFFEY	MICHELLE	LAVERN	1113 E	HARRISON	GILBERT	85296	N
HAGLER	PAULINE	ANTHONY	8711 E	PINNACLE PEAK	SCOTTSDALE	85255	N
HAHN	LEROY		306 S	7TH	102 BUCKEYE	85326	Y
HALL	KEITH		1001 E	BUTLER	PHOENIX	85020	Y
HAMSTRA	SIEBE		2361 S	PEACOCK	CHANDLER	85248	N
HARMAN	ROBERT		744 W	BEVERLY	PHOENIX	85023	N

March 2006

HENDERSON	KAAREN	M	5318 E	LINDSTROM	LN	MESA	85215	N
HERNANDEZ	JAMES	DONALD	1327 E	WASHINGTON	AVE	GILBERT	85234	N
HINCHEY	THOMAS	FRANCIS	15835 N	9TH	AVE	PHOENIX	85023	Y
HINDENLANG	ERNIE	CHALMER	2501 W	WICKENBURG	WAY	135 WICKENBURG	85390	Y
HOLDREN	BRIAN	JAMES	3830 S	BARBERRY	PL	CHANDLER	85248	N
HOLLINGSWORTH	LEE	FRANCES	3314 N	68TH		250W SCOTTSDALE	85251	N
HOLMGREN	MICHAEL	A	3940 W	ALICE	AVE	PHOENIX	85051	N
HOSSACK	GEOFFREY	TODD	1616 W	GERMANN	RD	3005 CHANDLER	85248	N
HOWLETT	KITTY	LAMAE	5361 E	FORD	CIR	MESA	85215	N
HUSK	CARA	SUE	7936 S	DROMEDARY	DR	TEMPE	85284	N
INGRAM	GEORGE	GILFORD	695 W	GARY	DR	CHANDLER	85225	N
JACKSON	AMANDA	MARIE	2255 W	GERMANN	DR	2136 CHANDLER	85248	Y
JACKSON	MITCHELL	DEAN	290 N	JACKSON	RD	WICKENBURG	85390	N
JENSEN	CAROL	ANN	2743 E	LA COSTA	DR	CHANDLER	85249	N
JOHNSON	HEATHER	ANN	2041 E	PEBBLE BEACH	DR	TEMPE	85282	N
JONES	CHRISTINE	C WALKER	8135 N	35TH	AVE	1101 PHOENIX	85051	N
KING	RACHELLE		8242 W	VOLTAIRE	AVE	PEORIA	85381	N
KOSMAL	ROBERT	KENNETH	4908 W	IRONWOOD	DR	GLENDAL	85302	N
KRAFT	CHRISTINE	NICOLE	4532 E	BADGER	WAY	PHOENIX	85044	N
KREBS	NATALIE	LYNN	4610 E	HAZELTINE	WAY	CHANDLER	85249	N
LAESSIG	BRUCE	A	15104 E	GREENE VALLEY	RD	FTN HILLS	85268	N
LANE	THOMAS	RYAN	13341 N	82ND	DR	PEORIA	85381	N
LEONARD	IVALOU	G	11161 E	POINSETTIA	DR	SCOTTSDALE	85259	Y
LEVITTE	JESSICA	LOUISE	7224 W	DREYFUS	DR	PEORIA	85381	N
LEVY	JOAN	MARCIA	3846 N	PUEBLO	WAY	SCOTTSDALE	85251	Y
LEWIS	HAROLD	G	316 N	MILLER	RD	1113 BUCKEYE	85326	N
LEWIS-BABICKA	LORI	LEE	2293 E	BONITA	ST	GILBERT	85296	N
LUNA	PAUL	JEROME	14627 S	46TH	ST	PHOENIX	85044	N
LYNCH	WILLIAM	DANIEL	11412 E	BELLA VISTA		SCOTTSDALE	85259	Y
MALLOY	AMY	ELIZABETH	2795 E	PALM BEACH	DR	CHANDLER	85249	N
MANFRA	THERESA	LOUISE	16626 E	WESTBY	DR	106 FTN HILLS	85268	Y
MANNIS	BURTON	RONALD	8619 E	SAN RAFAEL	DR	SCOTTSDALE	85258	N
MARICH	RUTH		1475 N	GRANITE REEF	DR	SCOTTSDALE	85257	N
MARKLEY	BEN	ROBERT	8855 W	CHRISTOPHER MICHAEL	RD	SCOTTSDALE	85345	N
MARTIN	CLAUDIA	SOTO	1829 E	LOMA VISTA	LN	PEORIA	85282	N
MCDERMOTT	FILIPPINA	MARY	12000 N	90TH	DR	TEMPE	85260	N
MELCHIORRE	MICHELLE	CLARE	11427 N	CHIPMUNK	ST	1046 SCOTTSDALE	85268	N
					LN	FTN HILLS		N

March 2006

MELENDEZ	ANTHONY	EDWARD	6250 N 19TH	PO BOX 900	WICKENBURG	85358	N
MILLER	JACQUELYN	E	3978 E GEMINI		328 PHOENIX	85015	N
MILNER	RICHARD	LEE	7669 E BAKER		CHANDLER	85249	N
MINWEASER	LARRY	DEAN	6719 S HARDY		SCOTTSDALE	85262	Y
MORRIS	ABDULLAH	I EL-AMIN	651 W BARROW		TEMPE	85283	Y
MULAZIM	BRIAN	CHRISTOPHER	22468 N 90TH		CHANDLER	85225	N
MYERS	HAELY	CORRINE	8051 E LONE MOUNTAIN		SCOTTSDALE	85255	N
NAUGLE	JOHN	RICHARD	8051 E LONE MOUNTAIN		SCOTTSDALE	85262	Y
NAUGLE	WILLIAM	E	8092 E DEL LATON		SCOTTSDALE	85262	Y
NEUZIL	JEAN	L	127 E MESQUITE		SCOTTSDALE	85258	N
NIELSEN	MALTA	JEANETTE	10602 E IRONWOOD		GILBERT	85296	Y
O'GORMAN	CAROLYN	JOYCE	6527 N 24TH		MESA	85208	Y
ORTIZ	DANIEL	ROSS	6818 E 5TH		PHOENIX	85015	Y
OSERAN	CAROLYNE	RICHARD	1621 S CARRIAGE		SCOTTSDALE	85261	Y
PERKINS	HAROLD	EDWAED	4442 E DELTA		CHANDLER	85248	Y
PERKINS	CHARLES	CHARLENE	16455 E AVENUE OF THE FOUNTAIN		MESA	85206	N
PLAMBECK	REBECCA	LEE	937 S SAN JOAQUIN		116 FTN HILLS	85268	N
POTTER	WANDA	MICHELLE	1525 S SANDSTONE		GILBERT	85296	N
PROCTOR	DANA	LORRAINE	25214 W PARKSIDE		GILBERT	85296	N
REED	JANE	DANIEL	5959 E VALDAI		BUCKEYE	85326	N
REID	ALAN	PATRICK	5272 S HAZELTON		MESA	85215	N
RENFRO	DEANN	ARTHUR	853 E HAMPTON		TEMPE	85283	N
RHOTAN	RAYMOND	P	490 EL RECRCO		MESA	85204	Y
RICHARD	DUANE	MAY	4327 E HACKAMORE		6 WICKENBURG	85390	N
RIGG	JAY	KEN	6331 W PORT ROYALE		MESA	85205	N
RIGLE	SUSAN	JACOB	565 S DESERT CANYON		GLENDAL	85306	N
ROBERTS	KARDA	JEAN	4249 E DOUGLAS		WICKENBURG	85390	Y
ROLLINS	PAUL	BASHIR	15420 S 38TH		HIGLEY	85236	N
SANCHEZ	BONNIE	S	2657 E WESTCHESTER		PHOENIX	85044	N
SARSAM	JAMAL	MORLEY	2657 E WESTCHESTER		CHANDLER	85249	N
SARSAM	SANDRA	ROBERT	4776 E GUADALUPE		CHANDLER	85249	N
SAWYER	ANN	MAY	15026 N TAMARACK		2047 HIGLEY	85236	Y
SCHWEERS	WILLIAM	ANDREA	15026 N TAMARACK		FTN HILLS	85268	Y
SCHWEERS	KAREN	K	2562 E TORREY PINES		FTN HILLS	85268	Y
SHAMMAS	ANNE		6250 N 19TH		CHANDLER	85249	N
SHINDLER			112 W ESCALANTE		241 PHOENIX	85015	N
SHIPLE					BUCKEYE	85326	N

March 2006

SHOUGH	DALE	DUANE	7751 W	RUE DE LAMOUR	RD	PEORIA	85381	Y
SHUMWAY	KEVIN	MICHAEL	715	KELLIS	DR	WICKENBURG	85390	N
SIMMONS	BRENDA	S	756 W	HARVARD	DR	TEMPE	85283	Y
SMITH	SHELDON	STUART	12459 N	116TH	ST	SCOTTSDALE	85259	N
SPARR	MARTIN	A	3708 N	NAVAJO	TRL	SCOTTSDALE	85251	N
SPEARS	WAYNE	P	10819 N	105TH	WAY	SCOTTSDALE	85259	N
STANCIU	PATRICIA	LOUISE	4831 W	PURDUE	AVE	GLENDALE	85302	Y
STEWART	JEFFREY	NEAL	2652 E	WINGED FOOT	CT	CHANDLER	85249	Y
THAYER	BELINDA	SUE	1812 S	BRENTWOOD	PL	CHANDLER	85248	N
TINSTMAN	JUOY	L	11421	ASTER	RD	SCOTTSDALE	85259	Y
TURNER	MELINDA	BELL	2656 E	WESTCHESTER	RD	CHANDLER	85249	N
UNDERDOWN	TERESA	RAE	286 N	FRONTIER	DR	SCOTTSDALE	85390	Y
VADALA-HOMER	VALERIE	JEAN	20717 N	74TH	ST	WICKENBURG	85255	Y
VINCITORIO	SOPHIA	ELLEN	1204 N	CAMBRIDGE	WAY	SCOTTSDALE	85255	Y
VOLKMAN	DOUGLAS	E	4043 E	FAIRVIEW	CIR	CHANDLER	85225	N
WARS!	SYED	WASIF	857 N	EVERGREEN	CIR	MESA	85206	N
WATSON	CLARKE	WILLIAM	35152 N	80TH	ST	CHANDLER	85225	N
WEISS	CATHY	JO	55407 N	COYOTE CROSSING	WAY	SCOTTSDALE	85262	N
WEIST	BARBARA	JEAN	14802 E	DELGADO	DR	WICKENBURG	85390	N
WESLEY	IRENE	VICTORIA	16641 S	27TH	LN	FTN HILLS	85268	N
WHARTON	APRIL	LYNN	3909 E	FLOSSMOOR	AVE	PHOENIX	85045	N
WHITEHOUSE	ORIANA	LYNN	2507 E	MANHATTON	DR	MESA	85206	Y
WIDGEON-FULLER	TERRY	LYNN	679 E	STOTTLER	PL	TEMPE	85282	N
WIGGINS	KARI	LYNN	9425 W	CAMINO DE ORO	PL	CHANDLER	85225	Y
WOJCEK	CHRISTOPHER	JAMES	15002 N	TANGLEWOOD	CT	PEORIA	85383	Y
YOUNCE	SHIRLEY	L	820 E	ROOSEVELT	AVE	FTN HILLS	85268	N
ZART	WILLIAM	LYMAN	3778 E	DEL RIO	ST	BUCKEYE	85326	N
GRAYSON	JUDITH	ANN	252 W	AMARANTH	DR	HIGLEY	85236	N
GREGORY	NANCY	ANN	590	BASS	LN	WICKENBURG	85390	Y
PETERSEN	DOUGLAS	KEITH	970670	CAMINO DE ALEGRA		WICKENBURG	85390	N



May 2006

GOODWIN	SUSAN	8029 E	VIA DEL SOL	DR	SCOTTSDALE	85255	N
GOULDTHORPE	RACHELLE	10235 E	JEROME	AVE	MESA	85209	N
GURR	CAROLYN	9330 E	FAIRBROOK	ST	MESA	85207	Y
HALL	DONALD	3314 N	68TH	ST	206W SCOTTSDALE	85251	N
HALL	GRACE	8155 E	FRITO	DR	MESA	85208	N
HASTINGS	VERNON	2316 E	CHICAGO	ST	CHANDLER	85225	N
HELLMANN	DALE	1322 E	EVERGREEN	ST	MESA	85206	N
HOUGE	KENNETH	810 E	ROBERTS	AVE	BUCKEYE	85326	N
HOUSE	LARRY	3327 N	CIVIC-CENTER	PLZ	135 SCOTTSDALE	85251	Y
HUBBARD	EDWARD	824 S	REVERE		MESA	85210	N
HULTZ	CORY	11253 E	RENFIELD	AVE	MESA	85212	N
ICKES	MELISSA	3460 E	HARMONY	AVE	MESA	85204	N
INOCENCIO	RAMIRO	8906 E	ORO	AVE	MESA	85212	N
JACKSON	NEWEL	2753 E	LYNWOOD	ST	MESA	85213	N
JERRICK	SUSAN	10306 E	JUANITA	AVE	MESA	85209	N
JESPERSEN	PAULEA	1636 E	GARNET	AVE	MESA	85204	Y
JOHNSON	LINDA	5068 E	ESCONDIDO	AVE	MESA	85206	N
JOHNSON	TERRI-LYNN	8332 E	ARLINGTON	RD	SCOTTSDALE	85250	N
JONES	CAMERON	10321 E	JUANITA	AVE	MESA	85209	N
KELLER	MICHAEL	6762 W	SHANNON	ST	CHANDLER	85226	N
KIMBRELL	AMANDA	607 E	EASON	AVE	BUCKEYE	85326	Y
LANGLEY	JUNE	9494 E	BECKER	LN	SCOTTSDALE	85260	N
LARAWAY	FREDRIC	11429 E	DOWNING	ST	MESA	85207	Y
LEE	JERI	111 E	BASELINE	RD	BUCKEYE	85326	Y
LILIENT	CECELIA	12121 E	GOLD DUST	AVE	SCOTTSDALE	85259	Y
LILIENT	LAWRENCE	12121 E	GOLD DUST	AVE	SCOTTSDALE	85259	Y
LONG	MATTHEW	5555 E	DOLPHIN	AVE	MESA	85206	Y
LOUGHRAN	MAURA	8542 E	ROANOKE	AVE	SCOTTSDALE	85257	Y
LYMER	MARK	719 W	10TH	ST	TEMPE	85281	Y
LYNCH	KEITH	9547 E	MONTE	AVE	MESA	85209	N
LYONS	KELLY	2107 N	BRIDLEWOOD	AVE	MESA	85207	Y
MAZZEO	NANCY	10302 E	LAGUNA AZUL	AVE	MESA	85209	Y
MCATEE	JOYCE	4628 E	FLOWER	AVE	MESA	85206	Y
MCCAIN	CHARLES	10728 N	140TH	PL	SCOTTSDALE	85259	N
MCCLAINE	LUCINDA	9723 E	WOOD	DR	SCOTTSDALE	85260	N
MCCULLOUGH	GAVIN	2343 W	MAIN	ST	2066 MESA	85201	Y
MCINTYRE	JEFFERSON	1328 E	INDIGO	CIR	MESA	85203	Y

May 2006

MCNEIL	KAREN	LOUISE	323 W	LAGUNA	DR	85282	N
MILLER	LAWRENCE	FRANK	13804 E	GERONIMO	RD	85259	Y
MONTIERTH	WENDY	GUNNELL	5241 E	CATALINA	AVE	85206	N
MOREY	RISA	AINDA	4819 E	HALIFAX	ST	85205	Y
MURPHY-BAUER	KAREN	JENICE	1284 E	FORGE	AVE	85204	N
NICHOLS	LINDA	C	2654 E	LAUREL	CIR	85213	N
NIELSEN	NINA	MCCELWAIN	5735 E	MCDOWELL	RD	85215	N
OCONNOR	BEVERLY	JEAN	7506 E	ED RICE	AVE	85208	N
OCONNOR	DELMAR	WILLIAM	7506 E	ED RICE	AVE	85208	Y
PADELDFORD	KAREN	R	5428 E	GROVE	AVE	85206	N
PADELDFORD	RICHARD	JAMES	5426 E	GROVE	AVE	85206	Y
PEARCE	KATHERINE		3105 E	CAMINO	ST	85206	Y
PELOQUIN	SCOTT		9661 E	PAMPA	AVE	85213	Y
PETERSEN	CRYSTAL	RICKS	6261 E	MCLELLAN	RD	85212	N
PETERSEN	JARRET	VAUGHN	6261 E	MCLELLAN	RD	85205	N
PIAZZA	ANTHONY	ROBERT	12571 N	146TH	RD	85205	N
POSTERT	DUSTON	GARFIELD	4712 E	GROVE	WAY	85259	Y
PRICE	JOYCE	ANN	7800 E	BOULDERS	CIR	85206	Y
RAMSEY	CLAUDE		12000 N	90TH	PKY	85262	Y
RAMSEY	JAMES	EUGENE	954 N	94TH	ST	85260	N
RANDALL	LISA	A	18552 W	CAPISTRANO	AVE	85207	Y
RIFFICE	ANTHONY	MICHAEL	5518 E	LINDSTROM	LN	85338	Y
RIFFICE	RAQUEL	ROSE	5518 E	LINDSTROM	LN	85215	N
RIVERS	GAYLE	MARY	11482 E	ASTER	LN	85215	N
ROBERTS	EILEEN	MARIE	11288 S	INDIAN WELLS	DR	85259	Y
ROCHE	DENISE	HALE	2308 N	CABOT	DR	85338	N
ROSPAPA	DENISE	MARIA	7109 E	JENSEN	CIR	85207	N
ROY	LINDA	JOYCE	5496 S	DOVE WASH	ST	85207	Y
RUIZ	ADRIANA	BERENICE	418 N	DREW	ST	85326	Y
RYAN	GRACE	PATRICIA	4710 N	70TH	ST	85201	N
SCHALLER	JOHN	LAWRENCE	10410 E	WETHERSFIELD	RD	85251	N
SCHROEDER	CHERYL	ANNE	3348 E	HAMPTON	AVE	85259	N
SHAW	LYNDA	EILLEN	10000 S	PALO VERDE	RD	85204	N
SLOAN	MARGARET	LOUISE	4222 E	HOLMES	RD	85343	N
SMITH	GWENDOLYN	YVONNE	10426 E	JAVELINA	CIR	85206	N
SMITH	STEFAN	DION	10426 E	JAVELINA	AVE	85209	N
SPARKS	TONY	LEE	7787 E	SOARING EAGLE	AVE	85209	N
					WAY	85262	Y

May 2006

SPARKS	VIRGINIA	ANN	7787 E	SOARING EAGLE	WAY	SCOTTSDALE	85262	Y
STEPHENSON	KATHERINE	EDNA	218 E	FAIRMONT	DR	TEMPE	85282	N
STEVENS	WANA	L	2451 E	ALPINE	AVE	MESA	85204	Y
SWEET	SHANNON	ROLAND	38505 N	251ST	AVE	MORRISTOWN	85342	Y
SWINICK	MICHELE	FRANCES	13188 N	104TH	PL	SCOTTSDALE	85260	N
THERIAULT	KENNETH	WILFRED	8204 E	PERALTA	AVE	MESA	85212	Y
THOMAS	ARMEL	E	2322 S	ROGERS		42 MESA	85202	N
THOMAS	NATALIE	Y	2322 S	ROGERS		42 MESA	85202	N
THOMPSON	HAZEL	MIRRIAM	2744 N	TREVINO	PL	MESA	85215	N
TRAFICANO	ADELE	ANNE	4723 E	CAROL		MESA		Y
TUCKER	KEVIN	ROBERT	1406 E	KRAMER	ST	MESA		N
TURNER	DENNIS	L	12815 N	89TH	PL	SCOTTSDALE	85203	N
ULLOA	CARLOS	ENRIQUE	57 N	ALMA SCHOOL	RD	103 MESA	85260	Y
WENNMACHER	ANITA	LORRAINE	5722 W	ORCHID	LN	CHANDLER	85201	N
WHEELER	TAMMIE	LYNN	11266 E	ESCONDIDO	AVE	MESA	85226	N
WILKERSON	MELISSA	ERIN	2803 E	LOCKWOOD	ST	MESA	85208	Y
WORTHEN	JUDITH	JOHNSON	2110 S	BARRINGTON		MESA	85213	N
WRIGLEY	DANA	J	1233 N	MESA	DR	MESA	85209	N
YANEZ	ARTEMIS	R	1028 E	FAIRMONT	DR	MESA	85201	N
ZARKOU	RUSSELL	JIM	1009 W	2ND	ST	TEMPE	85282	N
						MESA	85201	N

# EXHIBIT 16

1 **JON R. SMITH**  
2 **YUMA COUNTY ATTORNEY**

3 **WILLIAM J. KEREKES**  
4 State Bar Number 007073  
5 Deputy County Attorney  
6 250 W. Second Street, Suite G  
7 Yuma, Arizona 85364  
8 Phone: (928) 817-4300  
9 Fax: (928) 817-4302

10 **IN THE UNITED STATES DISTRICT COURT**  
11 **IN AND FOR THE DISTRICT OF ARIZONA**

12 **MARIA M. GONZALEZ, et al.,**

13 **Plaintiffs,**

14 **vs.**

15 **STATE OF ARIZONA; JAN BREWER, in her**  
16 **official capacity as Secretary of State of Arizona,**  
17 **et al.,**

18 **Defendants.**

19 **THE INTER TRIBAL COUNCIL OF AIROZNA,**  
20 **INC., et al.,**

21 **Plaintiffs,**

22 **vs.**

23 **JAN BREWER, in her official capacity as**  
24 **Secretary of State of Arizona,**

25 **Defendant.**

No.: CV06-01268-PHX-ROS (Lead)  
No.: CV06-01362-PCT-JAT (Cons)

**DEFENDANT YUMA COUNTY'S  
RESPONSE TO PLAINTIFFS' FIRST SET  
OF INTERROGATORIES**

26 **COMES NOW** the Yuma County Attorney's Office, by and through Deputy County Attorney,  
27 **WILLIAM J. KEREKES,** and responds to Plaintiffs' First Set of Discovery Request.  
28



1 provide that information.

2 ANSWER:

3 *Yuma County does not track or maintain the information requested in this interrogatory.*

4 4. State the total number of voters who registered in your county on the effective date of the  
5 amendment to *A.R.S. § 16-166* and who, pursuant to *A.R.S. § 16-166(G)*, were deemed to have provided  
6 satisfactory evidence of citizenship and not required to resubmit evidence of citizenship unless changing  
7 voter registration from one county to another.

8 ANSWER:

9 *Yuma County does not track or maintain the information requested in this interrogatory.*

10 5. For each election conducted in your county since the implementation of the voting-  
11 related provisions of the Arizona Taxpayer and Citizen Protection Act please state the number of  
12 registered voters who (a) voted by mail; (b) cast a regular ballot at a polling place; (c) were not  
13 permitted to cast a regular ballot at a polling place due to the failure to provide identification required by  
14 *A.R.S. § 16-579*; (d) cast a provisional ballot due to the failure to provide identification required by  
15 *A.R.S. § 16-579*; (e) cast a provisional ballot and subsequently provided satisfactory proof of  
16 identification to the county recorder's office; and (f) cast a provisional ballot that was not counted due to  
17 failure to provide identification required by *A.R.S. § 16-579*. In addition, please identify any analyses,  
18 reports or studies in your possession that address the above.

19 ANSWER:

20 a. *See Early Voting Turnout sheet attached hereto as Exhibit "A".*

21 b. *San Luis Primary Election 3/14/06 - 2224 voters cast ballots at one polling place.*

22 *San Luis General Election 5/16/05 - 2695 voters cast ballots at one polling place.*

23 *City of Somerton Special Election 5/16/06 - 427 voters cast ballots at the one polling*  
24 *place.*

25 *Yuma Elementary School District #1 Override Election 5/16/06 - 78844 voters cast*  
26 *ballots at 17 polling places --ballots cast at each polling place.*

27 c. *Unknown*

28 d. *Seven (7).*

1 e. Two (2).

2 f. Five (5), see document attached hereto as Exhibit "B".

3 6. Identify the forms of identification that have been deemed acceptable by your county to  
4 establish the identity of electors in accordance with the requirements of *A.R.S. § 16-579(A)*.

5 ANSWER:

6 See "*Procedure for Proof of Identification at the Polls*" attached hereto as Exhibit "C".

7 7. Provide a breakdown of the number of voter registration applications submitted in your  
8 county since the date of implementation of the amendment to *A.R.S. § 16-152* (requiring that voter  
9 registration forms contain proof of United States citizenship), that were on (a) Arizona Voter  
10 Registration Forms, (b) Federal Mail Voter Registration Forms, and (c) other voter registration forms.

11 ANSWER:

12 a. *Yuma County does not track or maintain the information requested in this interrogatory.*

13 b. *One (1).*

14 c. *Yuma County does not track or maintain the information requested in this interrogatory.*

15 8. Provide the identity of individuals who submitted voter registration application forms in  
16 your county since the date of implementation of the amendment to *A.R.S. § 16-152* whose applications  
17 were rejected due to the failure to provide satisfactory proof of citizenship as required by *A.R.S. § 16-*  
18 *152*.

19 ANSWER:

20 *Yuma County does not track or maintain the information requested in this interrogatory.*

21 9. Provide the identity of voters registered to vote in your county who, since the  
22 implementation of the voting related provisions of the Arizona Taxpayer and Citizen Protection Act, (a)  
23 were not permitted to cast a regular ballot at a polling place due to the failure to provide identification  
24 required by *A.R.S. § 16-579*; (b) cast a provisional ballot due to the failure to provide identification  
25 required by *A.R.S. § 16-579*; (c) cast a provisional ballot and subsequently provided satisfactory proof of  
26 identification to the county recorder's office; and (d) cast a provisional ballot that was not counted due  
27 to failure to provide identification required by *A.R.S. § 16-579*.

28 ANSWER:

a. *Unknown*

b. *Unknown*

1 c. *Marian Roldan; Maria Barroza; Paul Edward Meadows; Jose Yopez, Jr.; Brenda L.*  
2 *Florez*

3 d. *Unknown*

4 10. Identify each and every person whom you intend to call as a fact witness at the trial of  
5 this lawsuit or any other evidentiary hearing, including a hearing held pursuant to a motion for  
6 preliminary injunction, convened for the purpose of addressing the claims raised in plaintiffs' complaint.

7 ANSWER: *Defer to Maricopa County Attorney's Office.*

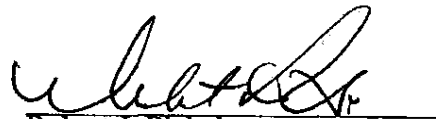
8 11. Identify each and every person whom you intend to call as an expert witness at the trial of  
9 this lawsuit or any other evidentiary hearing, including a hearing held pursuant to a motion for  
10 preliminary injunction, convened for the purpose of addressing the claims raised in plaintiffs' complaint.

11 Identify the subject matter(s) as to which the expert(s) will be providing testimony or opinions.

12 ANSWER: *Defer to Maricopa County Attorney's Office.*

13 Dated this 24 day of July, 2006.

14 **JON R. SMITH**  
15 **YUMA COUNTY ATTORNEY**

16   
17 Robert J. Pickels  
18 Deputy County Attorney

19  
20 COPY of the foregoing document  
21 mailed this 24 day of July, 2006 to  
the following:

22 Original plus one copy:

23 David J. Bodney  
24 Karen J. Hartman-Tellez  
201 E. Washington Street, Suite 1600  
25 Phoenix, AZ 85004-2382  
26 (*Attorneys for The Inter Tribal Council  
of Arizona, Inc., et al*)

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Copy:

David B. Rosenbaum  
Thomas L. Hudson  
Sara S. Greene  
2929 N. Central Ave., 21<sup>st</sup> Floor  
Phoenix, AZ 85012-2793  
*(Attorneys for The Inter Tribal Council  
of Arizona, Inc., et al)*

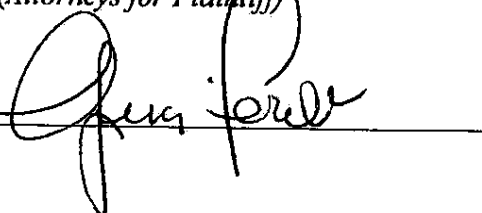
M. Colleen Connor  
MCAO Division of County Counsel  
222 N. Central Ave., Ste. 1100  
Phoenix, AZ 85003  
*(Attorneys for County Defendants)*

Dennis I. Wilenchik  
Kathleen Rapp  
2810 N. Third Street  
Phoenix, AZ 85004  
*(Attorneys for County Defendants)*

Mary O'Grady  
Peter Alex Silverman  
Office of the Attorney General  
1275 W. Washington Street  
Phoenix, AZ 85007-2926  
*(Attorneys for State of Arizona and  
Secretary of State Jan Brewer)*

Daniel R. Ortega, Jr.  
650 N. 3<sup>rd</sup> Avenue  
Phoenix, AZ 85003

Nina Perales  
Mexican American Legal Defense and Education Fund  
110 Broadway, Ste. 300  
San Antonio TX 78205  
*(Attorneys for Plaintiff)*



# EXHIBIT 17

*Certified Mail*  
AUG 4 - 2006

1 Daisy Flores  
GILA COUNTY ATTORNEY  
2 By: Bryan B. Chambers (# 0014371)  
Deputy County Attorney  
3 1400 East Ash Street  
Globe AZ 85501  
4 Telephone (928) 425-5212

5  
6 Attorney for Defendants Gila County Recorder  
And Elections Director

7 IN THE UNITED STATES DISTRICT COURT  
8 FOR THE DISTRICT OF ARIZONA

9 MARIA M. GONZALES; JESUS M.  
GONZALES; BERNIE ABEYTIA;  
10 LUCIANO VALENCIA; DEBBIE LOPEZ,  
SOUTHWEST VOTER REGISTRATION  
11 EDUCATION PROJECT; VALLE DEL  
SOL; FRIENDLY HOUSE; CHICANOS  
12 POR LA CAUSA, INC.; and ARIZONA  
HISPANIC FORUM,

13 Plaintiffs,

14 v.

15 STATE OF ARIZONA, JAN BREWER, in  
16 her official capacity as the Secretary of State  
of the State of Arizona, et al.,

17 Defendants.

No. CV06-1268-PHX ROS  
No. CV06-1362-PCT JAT

**ANSWERS TO FIRST SET OF  
INTERROGATORIES BY  
GILA COUNTY RECORDER  
AND COUNTY ELECTIONS  
DIRECTOR**

18  
19 Defendants Gila County Recorder and Gila County Elections Director, by  
20 and through undersigned counsel, hereby submit the following Responses to Plaintiffs'  
21 First Set of Interrogatories.

22 1. Identify each incident since January 1, 1996, in which (a) a non-United States

1 citizen was alleged to have registered to vote in your county; (b) a non-United States  
2 citizen was alleged to have voted at a polling place in your county; (c) a non-United  
3 States citizen was alleged to have voted in your county by early ballot pursuant to A.R.S.  
4 § 16-542(A); and (d) an individual impersonated a registered voter at a polling place in  
5 your county. With respect to each such incident, please provide: (i) the name, last known  
6 address and telephone number of the individual and whether the individual was lawfully  
7 in the United States at the time of the incident; (ii) the date the individual was registered  
8 to vote and/or voted; and (iii) whether criminal charges were filed against the individual  
9 and, if so, the case caption, court, docket number and disposition.

6 Answer: The Gila County Defendants have no information regarding incidents  
7 described in Interrogatory #1.

8  
9 2. Identify all reports, studies or memoranda in the possession of your office  
10 that discuss or relate to the voting-related provisions of the Arizona Taxpayer and  
11 Citizen Protection Act ("ATCPA" or "the Act"), amending A.R.S. §§ 16-152, 16-166  
12 and 16-579, or the effect, impact or consequences of such provisions (including but not  
13 limited to any analysis of the number of individuals who lack an Arizona driver's license  
14 or the other forms of identification required by the Act).

12 Answer: The Gila County Defendants have no information regarding incidents  
13 described in Interrogatory #2 except that Gila County does have Election Officer  
14 Certification Training Materials published by the Arizona Secretary of State's Office.

15 3. Provide the total number of voter registration forms in your county that  
16 have been submitted since the date of implementation of the amendment to A.R.S. § 16-  
17 152 set forth in the ATCPA (requiring that voter registration forms contain proof of  
18 United States citizenship), and of that total number provide the number that were (i)  
19 accepted (*i.e.*, the applicant was registered), (ii) rejected due to the application form's  
20 failure to contain satisfactory proof of citizenship as required by Proposition 200, and  
21 (iii) rejected for reasons other than the application form's failure to contain proof of  
22 citizenship. If a breakdown of this information is available by month, and age, race and  
ethnicity of applicant, please provide that information.

20 Answer: As of August 2, 2006, the total number of voter registration forms in  
21 Gila County that have been submitted since January 24, 2005 is 3,013. The total  
22 number that were (i) accepted is 2,942; (ii) rejected due to the application form's failure

1 to contain satisfactory proof of citizenship as required by Proposition 200 is 71, and (iii)  
2 rejected for reasons other than the application form's failure to contain proof of  
3 citizenship is 0.

4  
5 4. State the total number of voters who were registered in your county on the  
6 effective date of the amendment to A.R.S. § 16-166 and who, pursuant to A.R.S. § 16-  
7 166(G), were deemed to have provided satisfactory evidence of citizenship and not  
8 required to resubmit evidence of citizenship unless changing voter registration from one  
9 county to another.

10 Answer: As of January 2005, there were 27,521 active and 5,565 inactive  
11 registered voters in Gila County. All of these voters were deemed to have provided  
12 satisfactory evidence of citizenship and were not required to resubmit evidence of  
13 citizenship unless changing voter registration from one county to another.

14 5. For each election conducted in your county since the implementation of  
15 the voting-related provisions of the Arizona Taxpayer and Citizen Protection Act, please  
16 state the number of registered voters who (a) voted by mail; (b) cast a regular ballot at a  
17 polling place; (c) were not permitted to cast a regular ballot at a polling place due to the  
18 failure to provide identification required by A.R.S. § 16-579; (d) cast a provisional ballot  
19 due to the failure to provide identification required by A.R.S. § 16-579; (e) cast a  
20 provisional ballot and subsequently provided satisfactory proof of identification to the  
21 county recorder's office; and (f) cast a provisional ballot that was not counted due to  
22 failure to provide identification required by A.R.S. § 16-579. In addition, please identify  
any analyses, reports or studies in your possession that address the above.

18 Answer: There have been some city town elections in Gila County since the  
19 implementation of the Act, but Gila County does not conduct those elections and is  
20 unable to answer this question for them. On March 14, 2006 there were school elections  
21 conducted by Gila County for the San Carlos Unified School District and the Miami  
22 Unified School District. Both of these elections used all mail ballots. Consequently, all

1 voters voted by mail. No one voted at a polling place, and the voter identification  
2 provisions of the act did not affect the elections.

3 6. Identify the forms of identification that have been deemed acceptable by  
4 your county to establish the identity of electors in accordance with the requirements of  
A.R.S. § 16-579(A).

5 Answer: Acceptable forms of identification with photograph, name, and address  
6 of the elector are:

- 7 • Please see attached Gila County Division of Elections *Voters Identification at the*  
8 *Polls* card.

9 7. Provide a breakdown of the number of voter registration applications  
10 submitted in your county since the date of implementation of the amendment to A.R.S. §  
16-152 (requiring that voter registration forms contain proof of United States  
11 citizenship), that were on (a) Arizona Voter Registration Forms, (b) Federal Mail Voter  
Registration Forms, and (c) other voter registration forms.

12 Answer: See Answer to Interrogatory to #3 for the number of voter registration  
13 forms submitted since the date of implementation of the amendment to A.R.S. § 16-152.

14 (a) All of the voter registration forms Gila county has received since the implementation  
15 of the act have been using the Arizona Voter Registration Forms as opposed to other  
16 types of forms, (b) and Gila County has not yet received any Federal Mail Voter  
17 Registration Forms since the implementation of the act, and (c) Gila County has not  
18 received any other type of forms.

19 8. Provide the identity of individuals who submitted voter registration  
20 application forms in your county since the date of implementation of the amendment to  
A.R.S. § 16-152 whose applications were rejected due to the failure to provide  
21 satisfactory proof of citizenship as required by § 16-152.

22 Answer: See attached list of rejected Gila County voter registrations.



1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22

ORIGINAL of the foregoing mailed  
this 3<sup>rd</sup> day of August, 2006 to:

David B. Rosenbaum, Esq.  
Thomas L. Hudson, Esq.  
Sara S. Greene, Esq.  
OSBORNE MALEDON, P.A.  
2929 N. Central Ave., 21<sup>st</sup> Floor  
Phoenix, AZ 85012  
Attorneys for Plaintiffs

COPY of the foregoing mailed  
this 3<sup>rd</sup> day of August, 2006 to:

David J. Bodney, Esq.  
Karen J. Hartman-Tellez, Esq.  
STEPTOE & JOHNSON LLP  
201 East Washington Street, Suite 1600  
Phoenix, AZ 85004  
Attorneys for Plaintiffs

---

# Votantes

## IDENTIFICACIÓN EN LAS URNAS

El elector le informará su nombre y lugar de residencia al oficial electoral y presentará una forma de identificación de la Lista #1 O dos formas de identificación diferentes de la Lista #2. A.R.S. § 16-579(A)

### LISTA #1 – Suficiente ID de Foto incluyendo nombre y dirección **REQUIEREN (1) UNO**

- Licencia válida para conducir o identificación del Estado de Arizona sin permiso para conducir
- Tarjeta de inscripción tribal u otra forma de identificación tribal
- Identificación válida emitida por el gobierno federal de los Estados Unidos, gobierno estatal o local

O

### LISTA #2 – Suficiente ID sin foto con nombre y dirección **REQUIEREN (2) DOS**

- Cuenta de servicios públicos del elector con fecha que no sea de no más de 90 días antes de la fecha de la elección. Una cuenta de servicios públicos puede ser por electricidad, gas, agua, basura, alcantarillado, teléfono, teléfono celular, o televisión de cable
- Estado de cuenta bancaria o de cooperativa de ahorros con fecha que no sea de más de 90 días antes de la fecha de la elección
- Registro de Vehículo de Arizona Válido
- Tarjeta de censo Indígena
- Declaración de impuestos de la propiedad de la residencia del elector
- Tarjeta de inscripción tribal u otra forma de identificación tribal
- Tarjeta de seguro de vehículo
- Identificación válida emitida por el gobierno federal de los Estados Unidos, gobierno estatal o local
- Tarjeta de Registro del Votante / Certificación del Registro
- Cualquier "Material de Elección Oficial" enviado por correo que tenga su nombre y dirección

El elector que no suministre la suficiente identificación no le entregará una boleta regular, sino que recibirá una boleta provisional condicional y tendrá cinco (5) días después de la elección Federal General y tres (3) días después de cualquier otra elección para suministrarle suficiente identificación a la Oficina del Registro para que su boleta provisional condicional sea tomada en cuenta.

## AYUDA A LOS VOTANTES

Para información adicional tocante esta elección, comuníquese con la División de Elecciones del Condado de Gila al (928) 402-8709, 402-8750, o 1-800-425-5095.

Para información acerca de como obtener una Boleta Temprana, comuníquese con la Oficina del Registro/Recordero del Condado de Gila al (928) 402-8733, 402-8735, o 1-800-291-4452.

# Voters

## IDENTIFICATION AT THE POLLS

A.R.S. § 16-579(A)

The elector shall announce his or her name and place of residence to the poll worker and present one form of identification from List #1 OR two different forms of identification from List #2.

### LIST #1 – Sufficient PHOTO ID with name and address **ONE (1) REQUIRED**

- Valid Arizona driver license or non operating identification
- Tribal enrollment card or other form of tribal identification
- Valid U.S. federal, state or local government identification

OR

### LIST #2 – Sufficient NONPHOTO ID with name and address **TWO (2) REQUIRED**

- Utility bill of the elector that is dated within 90 days of the date of the election. A utility bill may be for electric, gas, water, solid waste, sewer, telephone, cellular phone, cable television
- Bank or credit union statement that is dated within 90 days of the date of the election
- Valid Arizona Vehicle Registration
- Indian census card
- Property tax statement of the elector's residence
- Tribal enrollment card or other form of tribal identification
- Vehicle insurance card
- Valid U.S. federal, state, or local government issued identification
- Voter Registration Card or Recorder's Certificate
- Any "Official Election Material" mailing bearing your name and address

An elector who does not provide sufficient identification shall not be issued a regular ballot, but shall receive a conditional provisional ballot and will have five (5) days after a Federal General election and three (3) days after any other election to provide sufficient identification to the County Recorder in order for their conditional provisional ballot to be verified.

## VOTER ASSISTANCE

For additional information about the election, call the Gila County Elections office at (928) 402-8708, 402-8750, 402-8628 or 1-800-425-5095.

For information about how to obtain an Early Ballot call the Gila County Recorder's office at (928) 402-87353, 402-8735 or 1-800-291-4452.



# Attached list of rejected voter registrations

Name	Date
SMITH, AMY	11/1/2004
MINCHEW, MONICA	2/3/2005
TAYLOR, OKALENA	2/8/2005
VANDENBERG, DORTHEA	2/16/2005
SELLHEIM, KERRI	3/7/2005
ENGELSEN, KAREN	3/8/2005
LICANO, ANDREA	3/14/2005
HAMLET, BREANNA	3/19/2005
TAYLOR, TARA	3/22/2005
TOBER, DIANE	3/22/2005
JACKSON, LAURA	3/25/2005
PALMER, DANIELLE	4/4/2005
MARTINEZ, FRANCISCO	4/11/2005
HOUK, DIANA	4/12/2005
KINNEY, DEREK	4/12/2005
MANN, DUSTIN	4/19/2005
RUST, KIMBERLY	4/27/2005
KELLEY, JOHN	4/28/2005
GARCIA, TINA	4/29/2005
MALDONADO, REBECCA	5/9/2005
MOORE, PAULINE	5/9/2005
SCHULTZ, TONI	5/9/2005
DILLON, ANNA	5/11/2005
ORTEGA, KASEY	5/18/2005
LAUBER, ANGELA	6/15/2005
SANTILLAN, YOLANDA	6/23/2005
WALLACE, MICHAEL	7/12/2005
RYE, ALLISHA	7/14/2005
WEIGAND, BONNIE	7/14/2005
HUNT, GEOFFREY	7/25/2005
AMMONS, ALANA	8/8/2005
TOBIN, CHARLENE	8/22/2005
BLACK, SHERYL	9/1/2005
FLEMING, MARY	9/14/2005
D'AMICO, CAMILLO	9/20/2005
FENSTERMAKER, FRED	9/24/2005
BEERMAN, KATHRYN	9/29/2005
MUNRO, JOHN	10/10/2005
HARRIGAN, DAVID	10/12/2005
HARRIGAN, RENEE	10/13/2005
CRAIG, MATTHEW	12/2/2005
DELATORRE, MELISSA	12/7/2005
VESSELS, GARY	12/14/2005
HERRIMAN, PAMELA	12/21/2005
WRIGHT, EVELYN	12/21/2005
WOLF, DEANNA	12/24/2005
OWENS, DONNA	1/10/2006
WADDELL, BRANDON	1/10/2006
WADDELL, JULIA	1/10/2006
CASH, ANNA	1/20/2006
HOOD, CHARLES	1/20/2006

MERRIMAN, MARY	1/22/2006
MCNEIL, KENNETH	1/30/2006
WIMBERLEY, LESLIE	1/31/2006
CURTIS, BENJAMIN	2/1/2006
BLANCO, NATHAN	2/3/2006
RANDALL JR., BERNARD	3/14/2006
RYAN, DEBORAH	3/16/2006
ARMSTRONG, JOSEPH	4/11/2006
RUIZ, KIRBY	4/12/2006
← BURNETTE, VALENTINO	4/22/2006
CARROLL, KAREN	5/1/2006
KELLER, REBECCA	5/25/2006
HELGESON, TRACEY	6/6/2006
FRANCE, JASON	6/7/2006
LAMBERT, KEITH	6/26/2006
YOUNG, SARAH	6/26/2006
BURGE, ASHLEE	6/28/2006
DIEGO, JUAN	6/28/2006
CECIL, PAIGE	7/1/2006

# EXHIBIT 18

**Greene, Sara**

---

**From:** Connor Colleen [connorc@mcao.maricopa.gov]  
**Sent:** Tuesday, August 01, 2006 12:17 PM  
**To:** Greene, Sara; Peter Silverman; nperales@maldef.org; jwilcox@coconino.az.gov  
**Subject:** RE: Prop 200 proposed stip and order re briefing schedule

Sara- The Stipulation and Order are fine & you have permission to sign for me. Also, I've received 2 more responses to the question about "Election Mail."

Cochise County wrote: Cochise County will accept our "election mail" as non-photo id.

Pima County wrote:

**Any "Official Election Material" mailing bearing the voters name and address can be used as one of the two pieces of non-photo ID.**

**Only mail bearing the US Postal Service authorized "Official Election Mail" designation is considered to be "Official Election Material".**

**Please note that most "Official Election Material" does not bear the name and address of the voter. Instead, most "Official Election Material" (such as sample ballots, clean election pamphlets and publicity pamphlets) are mailed to registered voter households and therefore do not bear the name of the voter. Official Election Material mailed to a household is not acceptable as a form of non-photo ID.**

**Brad R. Nelson, Director  
Pima County Elections  
520.740.4280**