

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

No. 330 CD 2012

VIVIETTE APPLEWHITE; WIOLA SHINHOLSTER LEE; GLORIA CUTTINO; NADINE MARSH; BEA BOOKLER; JOYCE BLOCK; HENRIETTA KAY DICKERSON; DEVRA MIREL ("ASHER") SCHOR; THE LEAGUE OF WOMEN VOTERS OF PENNSYLVANIA; NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE, PENNSYLVANIA STATE CONFERENCE; HOMELESS ADVOCACY PROJECT,

Petitioners,

v.

THE COMMONWEALTH OF PENNSYLVANIA; THOMAS W. CORBETT, IN HIS CAPACITY AS GOVERNOR; CAROL AICHELE, IN HER CAPACITY AS SECRETARY OF THE COMMONWEALTH,

Respondents.

PRAECIPE FOR FILING TRIAL DECLARATIONS AND SUMMARY

TO THE PROTHONOTARY:

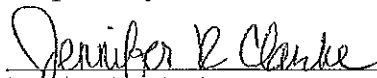
Kindly file the attached trial declarations and summary. These documents are being filed in an effort to conserve time and avoid cumulative testimony, consistent with the Court's direction that the hearing on remand in the above-referenced matter must be completed on September 26, 2012.

Such testimony is admissible in the resumed hearings on an application for a preliminary injunction. See Pennsylvania Rule of Civil Procedure No. 1531(a) ("In determining whether a preliminary or special injunction should be granted and whether notice or a hearing should be required, the court may act on the basis of the averments of the pleadings or petition and may

consider affidavits of parties or third persons or any other proof which the court may require.”) Accordingly, preliminary injunction rulings are often based on affidavits and deposition testimony provided to the court by the parties. See *Gaeta v. Ridley School District*, 567 Pa. 500, 511 (2002) (upholding a preliminary injunction ruling where the “only available record evidence” was an affidavit supporting the lower court’s findings); see also *Robert Clifton Assoc., Inc. v. O’Connor*, 338 Pa. Super. 246, 252 (1985) (finding that Rule 1531 permits a court to rely on deposition testimony when considering a preliminary injunction).

Pursuant to the Court’s direction, Petitioners attempted to reach agreement over the admission of trial declarations for the remand hearings scheduled for September 25 and 27, 2012. At 10:34 a.m. September 26, counsel for the Commonwealth informed Petitioners that Respondents object to all of the declarations “because (1) there is no clear reason why the witnesses cannot be available for live testimony and (2) the manner in which these witnesses have been identified to us impedes our ability to defend the case.” Respondents further asserted that the subject matter of the declarations was not relevant to the issues to be heard by the Court and that the subjects of the declarations would require Respondents to produce additional testimony.

Respectfully submitted:



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Dated: September 26, 2012

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

Viviette Applewhite; Wilola Shinholster Lee; Gloria
Cuttino; Nadine Marsh; Bea Bookler; Joyce Block;
Henrietta Kay Dickerson; Devra Mirel ("Asher") Schor; the
League of Women Voters of Pennsylvania; National
Association for the Advancement of Colored People,
Pennsylvania State Conference; Homeless Advocacy
Project,

Petitioners,

v.

The Commonwealth of Pennsylvania; Thomas W. Corbett,
in his capacity as Governor; Carol Aichele, in her capacity
as Secretary of the Commonwealth

Respondents

Docket No. 330 MD 2012

CERTIFICATE OF SERVICE

I certify that I am this 26th day of September 2012, serving the foregoing Praecipe for
Filing Trial Declarations, upon the persons and in the manner indicated below, which service
satisfies the requirement of Pa. R. A.P. 121:

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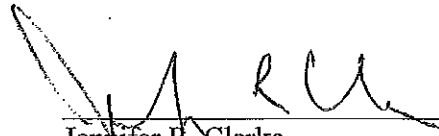
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Dated: Sept. 26, 2012



Jennifer R. Clarke
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Philadelphia, PA 19103

TO: Hon. Robert Simpson

FROM: Witold J. Walczak

RE: Declarants submitting Declarations in *Applewhite v. Commonwealth*¹

DATE: September 26, 2012

At the Court's request, I am submitting this summary of the declarations being submitted today. I have attempted to faithfully describe the contents of the declarations. Any errors or omissions are entirely unintentional and may be attributed to me. This summary does not include the testimony of the approximately 13 witnesses Petitioners intend to call for testimony on Thursday, September 27.

1. Petitioner in Lawsuit

- a. Petitioner, **Nadine Marsh**, testified on first day of July trial via videotape. Born in Allegheny County in 1928, she has never driven or been able to get a birth record. After Voter ID law passed, she tried again and has a letter from DOH that they have no record of her birth. Thus, she was unable to get PennDOT ID. Upon learning about new DOS ID, she decided to try again. Granddaughter helped her. Found that needed two proofs of residence, but since lives with her daughter doesn't get types of mail listed on website. Granddaughter had to send three emails to DOS help desk in late August before finally got answer, nearly week later, that should have someone else complete verification of residence form and bring one piece of mail. Granddaughter looked on website and found that East Rochester DMV open for business on Mondays. On September 17, daughter took off from work to drive Ms. Marsh the 20 miles and 40 minutes to DMV. Unable to get ID because while center open they don't issue ID's on Mondays. Not evident from website. Made same long trip next day, September 20. After waiting 20 minutes, spent an hour with a clerk who didn't seem to know much about ID, having to speak with supervisor and make telephone calls repeatedly. At end of process was told that would have to go home and wait for paperwork from Harrisburg, and then return with that on a third trip to get ID. She was not told why, what document she would get, or when it would arrive. As of September 26, Ms. Marsh does not have ID. [Note-Mr. Cawley showed Mr. Walczak copy of letter dated September 24 from PennDOT official Janet Dolan alerting Ms. Marsh that she can return to get an ID. As of today, with mail having come, Ms. Marsh had not received the letter]

¹ Additional declarations may be submitted before close of evidence.

2. People Without ID Who Cannot Get to DMV

- a. **Evelyn Ginensky:** 91-year-old woman moved from NYC to Philadelphia seven years ago, so never had a PennDOT ID and has no other photo ID. Has 24-hour-a-day care. The polling place is downstairs in her building, so cannot vote absentee. Almost never leaves building. Last time she needed medical care paid \$100 for transport. She is on a fixed income and cannot get to a DMV to get an ID.
- b. **Theresa Kukowski** is a Philadelphia resident who suffers from Multiple Sclerosis. She stopped driving about five years ago and is now wheelchair bound. She has no photo ID. Her polling place is a 1 and a half blocks from house, and husband pushes her wheelchair there. She learned on September 22 from DOS postcard that received in the mail that she would need ID to vote. "Traveling to a PennDOT center to get an ID in the short amount of time before this November's election would be very difficult." The closest DMV, Oxford Avenue, is over two miles away, too far for husband to push wheelchair. Very difficult to transfer her into their old minivan. Wants to vote because issues of Medicare and Medicaid are important to her.

3. People who have expired PennDOT ID but it was not expired 12 months when visited. Despite the ID not being valid for voting on November 6, they were made to pay \$13.50 to get a new ID.

- a. **Brenda Andrews:** 47-year-old resident of Philadelphia who has voted for many years. Her PennDOT non-driver photo ID had expired on 9/30/11, so she could no longer use it to vote on November 6 (it would be expired by more than a year). On 9/22, she went to the DMV at Philly Oxford-Levick. She signed the affirmation that she had no ID to vote, but the clerk said that he can't give her a free ID because she actually has valid ID for voting (even though won't be valid for next election). He consulted a manual in making this decision. Ms. Andrews was made to pay \$13.50 because her ID was not expired one full year. The PennDOT employee told her that it would be free if she came after September 30. She was accompanied by **Daniel Curry**, an SEIU organizer, who will testify.
- b. **Lori A. Flynn.** A Pittsburgh resident, she has an out-of-state driver's license which will not be valid to vote. On August 17, she went to the Smithfield DMV. After waiting 15 minutes, a clerk told her she was not eligible for a free voter ID because she had an out-of-state license. Supervisor Nash confirmed this. When Ms. Flynn tried to pay for a new driver's license, she was unable to because they do not take cash, checks or debit cards. On September 1, she consulted the PennDOT website to find an area DMV open on Saturdays, so she wouldn't have to take more time off from work. She spent one hour to get to Kelleket Drive. The DMV was closed, with the sign saying due to "Labor Day." While she was

there two other people came for services. She waited an hour to take the bus for another hour-long trip home. She returned to Kelleket DMV on Saturday, September 8, making another two-plus hour round trip. She paid for a PA driver's license.

4. **Refused Because PennDOT Didn't Follow Document Requirements**

- a. **Tunizia Brown** is a long-time voter in Philadelphia. She has lived at the same address and voted regularly for 43 years. She went to DMV after got letter from DOS in July saying needed ID. She has no birth record from SC so hasn't been able to get ID in past. Went in August to Phily-Ogontz DMV, where she waited an hour and then was told that she had to pay \$13.50, which she didn't have. She went home. She returned in "late August" with a \$13.50 money order, waited 2 hours (line out the door), but was rejected because she didn't have two proofs of residence. She had her SS and medicare cards, but no one had told her on last trip that she needed 2 proofs of residency. It is hard for her to stand in line so long because had blood clot in her leg in June and also has a knee replacement. She returned to DMV on 9/18 and waited two hours. A clerk told her that she had all necessary documents but rejected her anyway because he couldn't verify her voter registration (she showed him her voter registration card). The clerk sent her home with a telephone number to call DOS to resolve the problem. She went outside and called the DOS number and they found her registration immediately. She went back inside to ask the clerk to try again, and this time he was able to find it. She received her DOS ID on her third trip (but only because she was persistent and didn't leave on the last one).
- b. **Diane Dobkin** is a Philadelphia resident who has never had a PennDOT ID. She usually uses her passport for ID, but recently noticed that it expired on September 13. Not having any other form of ID and wanting to vote in November, on September 18 she went to the Ogontz DMV. She had to leave her 90-year-old mom home alone, for whom she cares. Ms. Dobkin had her birth certificate, SS card, passport, and multiple proofs of residency. The clerk refused to give her a DOS ID because she "brought only the bottom portion of SS card." Ms. Dobkin has no idea what that meant and the clerk refused to explain. The SS card she brought is the standard one with her name and number. The clerk wouldn't look at her other documents and "dismissed me brusquely." No one mentioned the DOS ID. On 9/20, she renewed her passport, paying \$170 for expedited delivery to be sure she has it on Election Day.
- c. **Ethel Hughes:** An 81-year-old resident of Birdsboro, Berks County, she took her 89-year-old friend Margaret Maccarone, who has never driven, to the DMV in Shillington on September 6. Ms. Maccarone votes in person. They told the clerk they wanted voter ID. Maccarone showed a birth certificate, two proofs of

residency and her medicare card, which contains her social security number. The clerk told her she needed an original SS card and that she needed to go to the Social Security Administration in Reading. The clerk never mentioned the DOS ID. Ms. Hughes didn't drive her friend to the SSA because she is afraid to drive into Reading. As of September 22, Ms. Maccarone had not gotten an ID.

- d. **Jean Foreman:** Went to Smithfield DMV in Pittsburgh on September 18 to get Voter ID. She was born in Sewickley Hospital, but at the time it was a segregated hospital and they apparently didn't record her birth. As recently as last year the DOH had told her they have no record of her birth. She brought her SS card and one proof of residency, a cable bill, because that was all she had. Living in an apartment she doesn't get much mail. The clerk refused to give her a "voter ID" because he told her that she needed a birth certificate. He told her to go the Vital Records office to get one. He wouldn't explain why she couldn't get a voter ID. She went outside and worked with organizers helping people get ID. They printed out a verification of residence form, which the van driver signed, and verified that she was registered. She returned to DMV with AFL-CIO counsel Emma Rebhorn (have declaration). She waited a long time. Being diabetic, she needed Rebhorn to get her juice. They both reviewed literature while waited and both believed that would be unable to get ID (nothing there about DOS ID). Finally called to different clerk, who also asked for birth certificate. Ms. Foreman showed him her documents and tried to explain that didn't have or need BC. Clerk told her to see supervisor, Dana Nash, who happened to at next desk. He got her the ID. The entire trip took about four hours.
- e. **Emma Rebhorn,** Ass't General Counsel for AFL-CIO in Pittsburgh. Attended "action" on September 18 to help people get voter ID at Smithfield St. DMV. Met Jean Foreman, who told him she had been rejected for ID and instructed to get birth certificate. Worked with other volunteers to get her a second proof of address and verified that registered to vote. The reviewed all literature inside DMV. FAQ said that need BC, SS, etc. to get ID. Nothing about DOS card. Both of us thought after reading literature that she would not be able to get the ID and would have to vote provisionally. Called to window after 75 minutes. Clerk immediately asked her for birth certificate. When she began to argue that didn't need it he said, you'll have to see a manager. Had to wait for manager - Ms. Foreman walks with cane so gave her the one chair. Looked at documents and spent 10 minutes calling DOS to verify registration. Then sent to another line to get photo taken. The process took another 25 minutes. Researched law in office and learned birth certificate not required for DOS ID. Found DOS ID FAQ on website. Returned to DMV on 9/19 and 9/20 to look at all literature in building. There was no DOS ID FAQ.
- f. **Milton Goldson:** Elderly Norristown man who is in a wheelchair, but long-time

voter who votes regularly at nearby polling place, and intends to continue voting in person. His ID expired in February, 2012. On August 20, friend Dorothy Sontag drove him to Norristown DMV. The clerk told him that he would need \$13.50 to get ID, and that would need money order. They left and went to Rite Aid to get the money order. When they returned another clerk said they didn't have to pay and gave him an ID. Without help from friend never would have gotten the ID because "process was very complicated and confusing."

- g. **Dorothy Sonntag** is a Norristown resident and long-time voter. She has a bad back and bad lungs and it is difficult for her to get around, but she drives. On August 20, she took her friend, **Milton Goldson**, to Norristown DMV. Had to wait 2 and one-half hours and shuttle between two buildings, which was very difficult for two elderly people. In second building, after second wait, clerk said that Milton needed \$13.50 money order for ID. Drove to Rite Aid. When returned Milton was already getting ID without having to pay. "The process was very complicated and confusing."
- h. **Katherine Knapp**: Philadelphia woman who went to Arch Street DMV on September 17 to renew her driver's license. While there observed people being refused voter ID. For instance, witnessed elderly woman who was refused because she did not have all of the proper documents. When her son asked for DOS ID, the PennDOT employee told him that the "PennDOT employee for the form for the Department of State ID was not in the facility on that particular day and they would need to come back at another time." Son explained that couldn't keep taking off from work to come there but they left empty handed. Observed another man ask PennDOT employee what forms he needed for the DOS ID. The employee's response was, "I do not know, and you will have to check the website." Saw mother of two young children enter but left because line was so long. Went home to check PennDOT website and there was no indication that DOS ID could only be obtained on certain days.
- i. *See also, Eric Stillabower.*

5. **People sent home because DOS couldn't verify voter registration.**

- a. **James Sharp**: 48-year old Philly resident who had spent ten years in the U.S. military. Has a Veterans ID, but that won't work to vote. Missed work, where is paid hourly, on August 28 to get ID. Went to the Arch St. DMV with Veterans' ID, SS card, recent PA prison ID, two proofs of resident and DD214 (separation from military service document). Waited most of the day. When clerk called DOS to verify voter registration at 4:30, could not get through to anyone in Harrisburg DOS because they had gone home for the day. He was furious at long wait and at not getting ID. Supervisor told him that would get priority when

returned. Also advised him to get regular PennDOT ID by going to get birth certificate from NJ. Early next morning he took the train to Trenton, for \$6, and paid \$30 for birth certificate. Returned to Arch DMV where waited about 6 hours before got ID. While there saw people get up and leave because wait was so long. Was frustrated about having to take off two days of work and losing wages and having to spend money on transportation and to get a birth certificate. He has a "limited income." Difficult to spend this money but did it because voting is important to him.

- b. **Brittany Bodie-Palmer:** A Philly resident, she submitted her voter registration in May to Philly Board of Elections. Not having ID, on 9/22, she went to the Philly Oxford DMV. A clerk called but couldn't verify her voter registration. She went home without an ID.
- c. **Roland Hartle** is a Waynesboro, Franklin County, man. On August 28, he went to the DMV in Chambersburg with a birth certificate, medicare card (with SS number on it), and two proofs of residency. After waiting about 45 minutes to an hour, was told that while documentation was in order they could not verify his voter registration. He left empty handed. His state representative checked with Harrisburg for him and learned that he is properly registered to vote. The unsuccessful effort to get ID took about two hours. As of September 21 he still has no valid ID to vote.
- d. **Eric Stillabower** recently moved from Indiana to Pittsburgh. He registered to vote in early August. On August 16 he received a letter stating that information on registration incorrect (name spelled Stillzbower). He returned the enclosed correction sheet. On September 18 he went to Smithfield DMV. After 45 minutes, he presented 3 bank statements, electric bill and his girlfriend (to attest), with whom he lives. The DMV clerk said that need more, i.e., proof of who he is. Clerk requested birth certificate, social security card or driver's license. Eric asked for affidavit for voter ID, but clerk didn't know what he was talking about. Clerk insisted on the identity documents. After Eric argued with him, the clerk called someone and then said he would give Eric the affidavit. After filling out the form and waiting some more, the clerk made a call and said he could not give me ID because Eric wasn't registered to vote. He gave Eric a number, DOS in Harrisburg, and told Eric that he could not vote until he was registered. Eric works as a prep cook and Tuesday is only day off the PennDOT is open. On September 21, Eric checked the DOS website and found that he was still not registered. He wants to vote but as of September 21 has not ID.
- e. **Regina Trice** is a 45-year-old Philadelphia woman who does not have ID to vote. She neither owns nor rents a home and stays at a friend's home. She lost her job about three months ago. She eats at a soup kitchen everyday and does not have a

phone. She has no birth certificate, social security number or proofs of residence. She knows her SS number. In early September she went to a Philly DMV, where they told her she could not get ID because she does not have the necessary documents. No one told her about the DOS ID option.

f. *See also, Tunisia Brown, supra.*

6. **Went on day that DMV open but not issuing ID's**

a. **Carol Sicura** is a 90-year-old resident of Philadelphia and intends to vote in person on election day. Has not driven since 2000. On September 17, daughter drove her to DMV at Granite Run Mall in Media. Waited 15 minutes and then asked for voter ID. Clerk told her that despite the fact other people were getting picture taken, clerk said that taking photos only for people getting driver's licenses but not people getting free Voter ID's. She asked clerk for "copies of any forms she would need to complete for a photo ID for voting purposes." The clerk indicated that he had no idea what forms she would need and to call main number for PennDOT in Harrisburg. Went home where daughter looked up what forms she needed. Also looked up this DMV's hours and nothing indicated that they did not issue voter ID's on Mondays. As of September 21, she remains without ID for voting.

b. **James Cummings** is a 90-year-old Scranton resident and WWII veteran who has never missed a vote. His driver's license expired long ago. On September 6, his son took off from work to drive him to DMV in Dunmore. He presented his SS card, expired driver's license and 2 proofs of residence. He was told that he needed papers from the licensing center, which is closed Monday, Tuesday and Thursday. He didn't get ID. He complains that PennDOT needs to expand days that can get ID or more clearly report on when you can get the ID. He now needs to get a ride on a Wednesday to get ID. He thus far has been unable to return to DMV and has no ID to vote in November.

c. *See also, declaration of Petitioner Nadine Marsh.*

7. **Problems at PennDOT**

a. **Suzanne Williamson** is a 61-year-old Philadelphia resident who lives with her 52-year-old sister, **Mattie Lee Williams**. Mattie is autistic. Voting is important to Mattie, so Suzanne realized she would have to get her ID. In late August they went to DMV at Ogontz. Brought birth certificate, SS card and proofs of residency. Clerk refused to give ID because said that even though birth certificate was from hospital with "gold raised seal," it was from hospital not State. Clerk told Suzanne to go to Dept. Of Vital Records to get birth certificate. It's a long

trip downtown but went to DVR but had to wait so long that needed to leave. Went back two days later, but clerk said couldn't get Mattie's birth certificate unless Suzanne brought copy of her own. Realized that needed help so sent to Pennsylvania Voter ID Coalition. An advocate accompanied her on September 15 back to Ogontz DMV. Brought the same documents and this time was able to get ID for Mattie. It would have been easy to give up on this process, but voting is so important to Mattie. Every election day she asks Suzanne, "When are we going to vote?"

- b. **Martha Sudler** is a 62-year-old Philadelphia resident. She went to the Island Ave. DMV on August 28. She brought her social security card, a letter from SSA and a copy of her birth certificate. She does not have an original. She spent five hours at the DMV only to be given a form to fill out to try to verify her birth, and told that she would get a letter in the mail in about ten days. They never offered her a DOS ID. In first week of September received letter that unable to find birth record. On September 20 walked back to DMV - was hard to find a day because takes care of grandchildren during the day - and got ID after waiting about 30 minutes.
- c. **Cheryl Ann Moore**, was the subject of a Washington Post article written the day of the Supreme Court argument. She has affirmed the facts of her story in the article. On September 16, she used her day off from working at the hospital and went to DMV at Arch Street to get photo ID to vote. She was told at 11:38 that the estimated wait time was 63 minutes. The 54-year-old has been a regular voter since age 19. She was called to a window at 1:42. She was given another form to complete and they verified her voter registration. She was directed to another line to get a photo. The time was 2:10. At 3:25, nearly 4 hours after she got there, her number was called. She got her ID shortly thereafter.
- d. **Sue Madway Levine, Ed.D.:** Kennett Square resident who is helping people get voter ID. Acquainted with PennDOT training materials. People are advised to call PennDOT to verify that "in system" if trying to renew expired PennDOT ID. Called customer service number, 1-800-932-4600, on September 19. There was no prompt to speak with customer service representative, no prompt to verify that person in PennDOT database, and no prompt for Voter ID. Decided to try pressing number for "driver's license." About 2-3 minutes into message there was finally a prompt for photo ID for voting purposes. Forced to listen to about 5-minute recording about all documents that need to bring to get voter ID. At end of that no prompt to reach customer service or to find out if person in PennDOT system. Pressed "0" and got a "Michael." Asked him about how to verify if person in system. He insisted I give him my license number and I explained that trying to learn how to see if someone in system. He said, "we don't do that." She asked him to pretend she didn't know if she was in system, and he put her on hold

for about 2 minutes. Returned and verified that in system. Dr. Levine asked to speak with supervisor. After extended wait, Michael told her that supervisor would call by Friday. Later in day received call from Eric Alzan, who apologized that prompts didn't work and promised to get them fixed. Have not had chance to check if done so.

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VIVIETTE APPLEWHITE, *et al.*,
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THE COMMONWEALTH OF
PENNSYLVANIA, THOMAS CORBETT,
Governor, and CAROL AICHELE,
Secretary of the Commonwealth,
Respondents.

Case No. 330 MD 2012

DECLARATION OF (NAME)

I, BRENDA Andrews, hereby declare as follows:

1. I am over the age of 18 and otherwise competent to testify.
2. I am a resident of (city and county).
3. I am registered to vote in Pennsylvania and otherwise meet the qualifications for voting, namely, I am over the age of 18, a U.S. citizen, and have lived in Pennsylvania for more than 30 days.
4. The facts about me and my effort to get a voter ID contained in Exhibit 1, attached hereto, are true and accurate.
5. I declare that the facts set forth above are true and correct to the best of my knowledge, information and belief and are made subject to the penalties of 18 P.S. § 4909 relating to unsworn falsification to authorities.

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Case No. 330 MD 2012

DECLARATION OF (NAME)

I, BRENDA Andrews, hereby declare as follows:

1. I am over the age of 18 and otherwise competent to testify.
2. I am a resident of (city and county).
3. I am registered to vote in Pennsylvania and otherwise meet the qualifications for voting, namely, I am over the age of 18, a U.S. citizen, and have lived in Pennsylvania for more than 30 days.
4. The facts about me and my effort to get a voter ID contained in Exhibit 1, attached hereto, are true and accurate.
5. I declare that the facts set forth above are true and correct to the best of my knowledge, information and belief and are made subject to the penalties of 18 P.S. § 4909 relating to unsworn falsification to authorities.

Dated: 9-23-12

Brenda Andrews
(signature)

BREND A Andrews
(printed name)

Brenda Andrews

Exhibit 1

My name is Brenda Andrews and I am 47 years old. I have been registered to vote for as long I can remember, have always voted, and intend to vote in the upcoming election this November because I believe voting is important.

On September 22, 2012, I went to the Oxford Levick PennDOT office at 909 Levick Avenue in Philadelphia. My PennDOT non-driver's license identification card expired on September 30, 2011 and I wanted to renew my ID because I knew I would need an ID to vote.

On the PennDOT non-driver's ID application form I checked the box indicating that I had no other form of ID to vote, however the PennDOT employee (a man) told me that I had to pay \$13.50. I explained to him that I needed the ID to vote and that I should not have to pay. I saw him pull out a piece of paper and he told me that the PennDOT guidelines say I would not have to pay for the ID if I came back in eight days.

I asked my son, who was with me at the time, to get a money order for \$13.50 because I knew I needed an ID to vote and I did not want to make another trip to PennDOT. I paid the \$13.50 to renew my ID and left.

Pennsylvania
visitPA

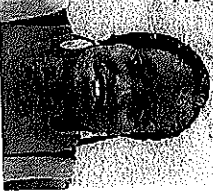
IDENTIFICATION CARD

110


ORGAN DONOR


BRENDA E ANDREWS
5449 ERDRICK ST
PHILADELPHIA PA 19124

Brenda Andrews



No: 26 602 144
DOB: 04/29/1965
Sex: F
Eyes: BRO
Height: 5'03"
Issued: 09/10/2008
Expires: 09/30/2011





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DECLARATION OF BRITTANY BODDIE-PALMER

I, Brittany Bodie-Palmer, hereby declare as follows:

1. I am over the age of 18 and otherwise competent to testify.
2. I am a resident of Philadelphia, PA.
3. I live at 3044 N. 21st St., Philadelphia, PA and my phone number is 267-978-8209.
4. In May 2012, I submitted a voter registration application by mail and have not received any confirmation or heard back from the Philadelphia Board of Elections.
5. On September 22, 2012, I went into the Oxford Levick PennDOT office at 919 Levick St., Philadelphia, PA and was refused an application because they said I was not registered.
6. I witnessed the PennDOT employee call to confirm my voter registration.
7. I told the PennDOT employee that I submitted a voter registration application in May and today, September, 22, 2012.
8. I left and went home without obtaining any ID.
9. I declare that the facts set forth above are true and correct to the best of my knowledge, information and belief and are made subject to the penalties of 18 P.S. § 4904 relating to unsworn falsification to authorities.

Dated: 09/22/18

Brittany Palmer
(signature)

Brittany Palmer
(printed name)

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

VIVIETTE APPLEWHITE, *et al.*,
Petitioners,

v.

THE COMMONWEALTH OF
PENNSYLVANIA, THOMAS CORBETT,
Governor, and CAROL AICHELE,
Secretary of the Commonwealth,
Respondents.

Case No. 330 MD 2012

DECLARATION OF TUNIZIA BROWN

I, Tunizia Brown, hereby declare as follows:

1. I am over the age of 18 and otherwise competent to testify.
2. I am a resident of (city and county).
3. I am registered to vote in Pennsylvania and otherwise meet the qualifications for voting, namely, I am over the age of 18, a U.S. citizen, and have lived in Pennsylvania for more than 30 days.
4. The statement contained in Exhibit 1, attached hereto, was freely made by me and is, to the best of my knowledge, information and belief, true and accurate.
5. I declare that the facts set forth above are true and correct to the best of my knowledge, information and belief and are made subject to the penalties of 18 P.S. § 4904 relating to unsworn falsification to authorities.

Dated: 9/24/12

Tanizla Brown
(signature)

TANIZLA BROWN
(printed name)

Exhibit 1 to Declaration of Tunizia Brown
Statement of Tunizia Brown
Page 1 of 2

My name is Tunizia Brown. I have lived at the same address here in Philadelphia for forty-three years and have been voting here for as long as I can remember. It took me three separate trips to PennDOT—plus a call to my local board of elections to verify my registration—just so I can vote again this November.

I received a letter from the state in the mail in late July telling me that I was going to need an ID to vote this fall. I have tried in the past to get a Pennsylvania ID but have never been able to because I do not have my birth certificate. I was born at home in South Carolina—the 14th of 15 children—and although my other siblings have their birth certificates, the state of South Carolina has no record of me. I have been trying for years to get a birth certificate so I can get a real ID, and hope to see a lawyer soon to help me with this problem.

Shortly after I received the letter about the ID law, I made my first visit to the PennDOT on Ogontz Avenue in Philadelphia to try to get an ID. This office is about twenty minutes from my house by car. My husband drove me to the office and we waited for an hour or so before being helped. When I told them I wanted an ID, they told me I needed a money order for \$13.50. I did not have that, so we left.

A few weeks later, I got a money order and my husband drove me back to PennDOT. This time the line was out the door and we waited for at least two hours, some of it standing. Long waits like this are difficult for me because I was hospitalized in June for a blood clot in my leg and when I stand for a long time, it starts to swell. I have also had a knee replacement.

When my number finally got called, I showed them my social security card and my senior's card, but they told me I also needed two bills or letters to prove my address. I had not brought anything like this because they didn't tell me at my first visit that I needed to. So I left, again without an ID.

My husband drove me back to PennDOT on or around September 18th. This time I brought proof of my address including an old voter registration card that I believe is close to twenty years old. Again, we waited for around two hours in the crowded waiting area. This time, the PennDOT employee told me that I had all the documents to get an ID for voting as long as he could verify that I was registered. He made a phone call, and after a few minutes came back and told me I was not in the system.

He gave me a paper with a state number and a local number to call to check on my registration status. I have been voting at this address for years, and have also served on jury duty a number of times, so I knew I had to be in there. I went outside to the parking lot and called the number he gave me. The woman I spoke to on the phone had no trouble finding my registration.

I went back inside, told the PennDOT employee what had happened, and asked him to call again. He did and this time he was able to find my registration. I didn't understand why he couldn't find

T.B.

Exhibit 1 to Declaration of Tunizia Brown
Statement of Tunizia Brown
Page 2 of 2

it the first time, but I was finally able to get an ID for voting. I was very frustrated by this whole process but I kept going because voting is important to me—it's something you can't just forget about because it is difficult.

J/B

IN THE COMMONWEALTH COURT
OF PENNSYLVANIA

Viviette Applewhite, Wilola Shinholster
Lee, Grover Freeland, Gloria Cuttino,
Nadine Marsh, Dorothy Barksdale, Bea
Bookler, Joyce Block, Henrietta Kay
Dickerson, Devra Mirel ("Asher") Schor,
the League of Women Voters of
Pennsylvania, National Association for the
Advancement of Colored People,
Pennsylvania State Conference, Homeless
Advocacy Project,

Petitioners

VS.

The Commonwealth of Pennsylvania,
Thomas W. Corbett, in his capacity as
Governor, Carol Aichele, in her capacity as
Secretary of the Commonwealth,

Respondents

Docket No. 330 MD 12

AFFIDAVIT OF JAMES. P. CUMMINGS

Commonwealth of Pennsylvania

County of Lackawanna

ss

Comes now James P. Cummings and being duly sworn, deposes and states as follows:

1. My name is James P. Cummings. I live at 816 Moosic Street, Scranton, Lackawanna County, Pennsylvania.

2. On September 18, 2012, the *Scranton Times* published my letter to the editor, a true and correct copy of that letter is attached to this Affidavit as Exhibit A.

3. My letter to the editor states a truthful and accurate account of my experience in attempting to obtain a photo identification for voting purposes.

4. As of today, I remain without photo identification that meets the requirements of Pennsylvania new voter ID law.

5. My son, Thomas P. Cummings, is a partner with the law firm Dougherty, Leventhal & Price, LLP. He has offered to take time off work for a second time to drive me back to the PennDOT center so that I can again attempt to obtain a photo ID for voting purposes.

6. I am 90 years of age. I am competent to testify. I am registered to vote in Pennsylvania and otherwise meet the qualifications for voting, namely, I am over the age of 18, a U.S. citizen, and have lived in Pennsylvania for more than 30 days. I intend to vote in person in the election of November 6, 2012.

Date: Sept. 24, 2012

James P. Cummings
James P. Cummings

Sworn to and subscribed
before me this 24th
day of Sept, 2012

Junda Radle
Notary Public

COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Junda Radle, Notary Public
Moosic Boro, Lackawanna County
My Commission Expires Nov. 8, 2015
MEMBER, PENNSYLVANIA ASSOCIATION OF NOTARIES

Wasted effort, expand hours

Editor: I am 90 years old and my driver's license has expired as I have not driven in several years. So, under the current law, I do not possess what would be considered valid photo identification to vote. I am proud that I have never missed the opportunity to vote on Election Day. Even while overseas during World War II, I was able to cast my vote via absentee ballot.

On Sept. 6, my son took time from work to drive me to the PennDOT driver's license center in Dunmore to secure the appropriate photo identification card so I can continue to exercise my right to vote. I presented my Social Security card, my expired driver's license and two utility bills to prove my identity. The courteous gentleman at the photo center informed me that I needed to secure separate paperwork from the driver's license center to secure the photo identification. The photo center and the driver's license center are separate entities within the same building. Unfortunately, I was then advised that the driver's license center was closed on Mondays, Tuesdays and Thursdays. Therefore, I was unable to secure my photo identification card.

If the state administration is intent on placing this added requirement of voter identification on its populace, it should either expand the operating hours of the driver's license center or explain more clearly when and where the driver's license center is open.

I have family close who will assist me in returning to secure this photo identification. Unfortunately, there are many out there who either do

not have access to transportation or require additional assistance to get to the Driver's License Center.

When this new voter identification law was passed, my thought was that this law would make it unnecessarily difficult for some people to exercise their right to vote. This thought was validated by my recent experience.

JAMES P. CUMMINGS
SCRANTON

A10 THE TIMES-TRIBUNE

EDITORIAL
www.times-tribune.com/editorial

SEPTEMBER 18, 20

EXHIBIT

A

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

VIVIETTE APPLEWHITE, et al.,
Petitioners,

v.

THE COMMONWEALTH OF
PENNSYLVANIA, THOMAS CORBETT,
Governor, and CAROL AICHELE,
Secretary of the Commonwealth,
Respondents.

Case No. 330 MD 2012

DECLARATION OF DIANE DOBKIN

I, Diane Dobkin, hereby declare as follows:

1. I am over the age of 18 and otherwise competent to testify.
2. I am a resident of Philadelphia. I am registered to vote in Pennsylvania and otherwise meet the qualifications for voting, namely, I am over the age of 18, a U.S. citizen, and have lived in Pennsylvania for more than 30 days. I intend to vote in person in the election of November 6, 2012.
3. I have never had a Pennsylvania driver's license or any other form of PennDOT photo ID. I usually use my U.S. passport when I need to show photo ID, but last week I discovered that my passport expired on September 13, 2012. I have no other form of photo ID that would enable me to vote under Pennsylvania's new voter ID law.
4. On September 18, 2012, I went to the PennDOT center at 801 Arch Street in Philadelphia to apply for a non-driver photo ID for voting purposes.
5. I am the caregiver for my ailing 90-year-old mother, but I took time away from her to go to PennDOT because voting in the upcoming election is very important to me.

6. I brought with me a three-inch-tall stack of identity documents, including: my raised-seal New Jersey birth certificate, a photocopy of my birth certificate, my Social Security card, my most recent Form W-2 and tax return, multiple utility bills and other proofs of residency, and my recently expired U.S. passport.

7. The PennDOT representative who processed my application told me that he could not give me a non-driver photo ID because I had brought only the "bottom portion" of my Social Security card. I did not and do not understand what he meant. The card I brought is a standard Social Security card bearing my name and my Social Security Number.

8. The PennDOT representative refused to look at the other documents I had brought to prove my identity, and he dismissed me brusquely.

9. No one at the PennDOT center mentioned to me that there is a new Department of State ID or mentioned any other way for me to obtain photo ID for voting purposes.

10. On September 20, 2012, I ordered a renewed U.S. passport on an expedited basis, in an effort to obtain some form of acceptable photo ID by November 6, 2012. Applying for this expedited passport cost me \$170.00. I am hopeful that I will receive the replacement passport in time to vote.

11. I also intend to pursue a replacement Social Security card in the near future.

12. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Dated: Sept. 21, 2012

Diane Dobkin

Diane Dobkin

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

VIVIETTE APPLEWHITE, *et al.*,
Petitioners,

v.

THE COMMONWEALTH OF
PENNSYLVANIA, THOMAS CORBETT,
Governor, and CAROL AICHELE,
Secretary of the Commonwealth,
Respondents.

Case No. 330 MD 2012

DECLARATION OF LORI A. FLYNN

I, Lori A. Flynn, hereby declare as follows:

1. I am over the age of 18 and otherwise competent to testify.

2. I am a resident of the City of Pittsburgh and the County of Allegheny.

3. I am registered to vote in Pennsylvania and otherwise meet the qualifications for voting, namely, I am over the age of 18, a U.S. citizen, and have lived in Pennsylvania for more than 30 days. I intend to vote in person in the election of November 6, 2012.

4. On Friday, August 17, 2012, I traveled to the PennDOT center at 708 Smithfield Street in Pittsburgh to obtain a PennDOT photo ID for voting purposes.

5. Since I do not own a car, I had to take the whole morning off work and travel to the PennDOT center by bicycle and bus, in the rain. The round trip took over one and a half hours.

6. At that time, I had a valid driver's license from a different state and I wanted to trade it in for a Pennsylvania driver's license, so that I could use a PennDOT photo identification to vote.

7. When I went to the PennDOT center on August 17, I brought all of the documentation I understood was necessary to get a Pennsylvania driver's license as well as cash, a credit card, and an ATM/debit card to pay any fees.

8. After I had waited for approximately 15 minutes, I spoke with a PennDOT employee who would not tell me his name. He told me he did not believe I would be eligible for a free photo ID and that I could not pay for a photo ID with any of the forms of payment I had brought. He told me to speak with his supervisor.

9. After waiting some more, I spoke with his supervisor, Dana Nash. Mr. Nash told me I would be unable to get a Pennsylvania driver's license on that visit, because the PennDOT center would accept only checks or money orders as payment, and I had brought only cash and credit cards.

10. I then asked for a free ID card for voting purposes, but Mr. Nash told me that I was ineligible because I still had my valid out-of-state driver's license.

11. He then informed me that PennDOT would begin accepting applications for the Department of State ID on August 27, 2012, but that I would also be ineligible for that ID, since I still have my valid out-of-state driver's license.

12. I left the PennDOT center on August 18, without any new form of photo ID.

13. On Saturday, September, 1, 2012, I consulted the PennDOT website to find a center open on Saturdays so that I could try again without taking more time off work.

14. The PennDOT website indicated that the center at 11620 Keleket Drive in Pittsburgh is open on Saturdays. This center is less conveniently located for me than the Smithfield Street center, and requires a bus ride of approximately one hour each way from my home, on a bus route that runs only once per hour on Saturdays.

15. I traveled to the Keleket Drive center to again try to obtain a PennDOT ID for voting purposes. When I arrived, I found a sign on the door saying "Closed Sept. 1 & 3 LABOR DAY." In the few minutes that I stood outside the door, I observed two other groups of people show up hoping to go into the center, and both groups told me that they too had checked the website and understood it to state that the center was open on Saturdays.

16. I left the PennDOT center on September 1, again without any PennDOT or Department of State ID. Afterward, I found a different page on PennDOT's website listing "holiday" closures, including the "holiday" of the Saturday preceding Labor Day.

17. I waited for approximately one hour for the next bus to arrive, and rode that bus for approximately one hour more in order to get back home.

18. I made another trip to the Keleket Drive PennDOT center on Saturday, September 8, 2012. As before, the bus ride was approximately one hour each way.

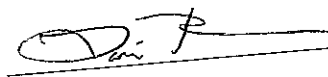
19. On that third visit to a PennDOT center, I at last obtained a PennDOT temporary driver's license. This document was valid for 15 days, i.e., it would expire before election day.

20. Approximately one week later, I received my PennDOT driver's license in the mail, and at last had a PennDOT photo ID that would be acceptable for voting on election day.

21. Very recently I became aware that my U.S. passport would also be an acceptable form of photo ID for voting.

22. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Dated: 09/21/2012


Lori A. Flynn

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

VIVIETTE APPLEWHITE, *et al.*,
Petitioners,

v.

THE COMMONWEALTH OF
PENNSYLVANIA, THOMAS CORBETT,
Governor, and CAROL AICHELE,
Secretary of the Commonwealth,
Respondents.

Case No. 330 MD 2012

DECLARATION OF JEAN FOREMAN

I, Jean Foreman, hereby declare as follows:

1. I am over the age of 18 and otherwise competent to testify.
2. I am a resident of Pittsburgh, Allegheny County.
3. I am registered to vote in Pennsylvania and otherwise meet the qualifications for voting, namely, I am over the age of 18, a U.S. citizen, and have lived in Pennsylvania for more than 30 days.
4. The facts about me and my effort to get a voter ID contained in Exhibit 1, attached hereto, are true and accurate.
5. I declare that the facts set forth above are true and correct to the best of my knowledge, information and belief and are made subject to the penalties of 18 P.S. § 4904 relating to unsworn falsification to authorities.

Dated: 9-21-2012

JEAN FOREMAN
(signature)

JEAN FOREMAN
(printed name)

Statement of Jean Foreman

I received a call from someone who was part of an organization, and she asked me if I wanted to go to PennDot to get a voter ID card. I said I definitely wanted to go. She told me on the phone that I would need my social security card, birth certificate, and two bills with my name and address on it. But I don't have much bills so I only brought my Comcast bill. I don't have a birth certificate because I was born in Sewickley Hospital which was a segregated hospital. There is no record of my birth because it was never registered. When I was 17 or 18 years old, I went to try and get my birth certificate downtown, but they could only give me a piece of paper that said there is no record of my birth. I've been trying for the last few years to get it but I'm unable to. I tried last year to get it again and still couldn't get my birth certificate. So I didn't bring a birth certificate because I don't have one, but I brought my social security card and the Comcast bill.

On Tuesday September 18, 2012, a small yellow school bus picked me up at approximately 9:30 a.m. It took about twenty minutes to get down to the PennDot downtown. When I got off the bus, a volunteer helped me off the bus and escorted me into the PennDot office. I entered and took a number, it was number 565. I sat for quite a while. They were on some number in the 300s when I first sat down. When they finally called my number I was happy to trot down there because I thought I was going to get my ID. I sat down with the clerk and told him that I'm here for the free voter ID. But the clerk was not listening to what I was trying to say to him. He looked at the documents I had and started asking for my birth certificate. I tried to explain to him that I didn't have one. Then he didn't want to hear much else after I told him that I didn't have it. He was telling me to go around the corner to get the birth certificate at "420." So I was asking if that 420 was the same 411 on 7th Avenue because that's where I had been before to try and get my birth certificate but was unsuccessful. But he just kept saying 420 without explaining, and I didn't know if he was talking about an office number. He was acting like he couldn't be bothered. He said there was nothing he could do; I didn't have what I needed. I realized I wasn't going to make any progress so I just left. Then I went outside and spoke to Ms. Nancy Spencer from the United Steelworkers who was volunteering outside. I explained to her what the man said and she told me to talk to Ms. Tracey Lewis who was also volunteering outside, and that she would help me. I was with Ms. Lewis for about 15 minutes trying to get some help. She took me to see a gentleman named Mr. Calvin Skinner from One Pittsburgh. Mr. Skinner helped me get a second proof of residency. He looked up my voter registration status on the SURE website that showed that I was an active registered voter and he pulled up my address from the VAN (voter activation network) website. Mr. Skinner sent someone to an office to print out these documents. Ms. Lewis had to leave, so another volunteer, Ms. Emma Rebhorn from the United Steelworkers, joined me and waited with me outside. I was waiting outside the whole time, waiting for the person to get back with my documents that they sent to print. Then after the person got back with my documents, the driver's assistant who was on the bus when it picked me up that morning up signed an affidavit

saying that that was indeed my address where I lived. After I had all these new documents in my hand, Ms. Rebhorn and I walked back into the PennDot office and hoped that we could just go to the front and not have to wait again. We were there for a couple minutes; we were walking past the line of clerks hoping that I could just continue the process with the clerk that was helping me the first time, in hopes that I could just continue this with him with my new documents. But the clerk was not there, so I had to just get another number. My number the second time was 645 and I got that ticket at 11:46 a.m. Ms. Rebhorn and I were sitting there waiting in the chairs (luckily there were enough seats for us to sit down), and we were reading the literature and handouts that we picked up from the PennDot counter about the free IDs. The paper that we were looking at said that they would have to call the department of health to verify my birth and then have to wait 10 days. The attorney, Ms. Rebhorn, told me that I may have to cast a provisional ballot. The way I understood it was that it would be better for me to vote absentee, like it would be easier if I wasn't there in person so that I wouldn't have to deal with all this mess. But I was thinking, no, it's important to me to vote, more so now more than other years. I have voted in the past, but this time it's very important. I said I am going to vote. Ms. Rebhorn and I were confused as we were sitting there trying to understand what the documents were saying. And then I wasn't feeling well, it was a long day. I'm diabetic and my blood sugar was getting low and I was getting antsy. I needed to eat something. I had to send Ms. Rebhorn to get me some orange juice. We were just sitting waiting so there was plenty of time for her to leave and get orange juice. It was probably around 12:30 p.m. at this time. After I got the juice I drank it and still had to wait some more. Then my number was finally called and we got very excited. This time we got called up and saw a different clerk than the first time. His first question was where's your birth certificate? I was trying to show him the documents that we had and explain that I didn't have my birth certificate, but he just said where's your birth certificate? Then he told me to see the supervisor Dana Nash. Luckily the supervisor was just right next to the other clerk so I sat down in a chair in front of the supervisor as he finished up a conversation he was having with someone else. I was very glad that Ms. Rebhorn was with me. I gave supervisor Nash all my papers and he got on the phone, and he was on the phone for at least 10 minutes. When we gave Nash the Comcast bill, Ms. Rebhorn realized my name was spelled wrong on the bill so she told him while he was on the phone. He said that makes a difference, and then he was able to confirm all my information. When he got off the phone, he gave me all my papers back and gave me a slip of paper to take to the photographer. I had to fill out one more form before I could get my ID card. But Ms. Rebhorn had to read the form out to me because I didn't have my glasses and I couldn't read it well. After I filled out that last form, then it was pretty quick to get my ID card. I gave the slip of paper to the photographer, signed my name on an electronic pad, and then the photographer took my picture. I finally had my voter ID card in hand. By the time I got outside it was about 1:15 p.m. I just wanted to go home and eat. The bus was waiting for me the whole time, and there were 2 other elderly ladies on the bus who had to wait for me whole time I was trying to get my ID card. I got on the bus and the driver drove straight to my apartment and dropped me off first.

It was very crazy in there, in the PennDot office. I never want to go through that again. It was a long day. I went through a whole bunch that day, I was glad to get back to my house.

Date: 9-21-12

Signature: JEAN FOREMAN

Name: JEAN FOREMAN

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

VIVIETTE APPLEWHITE, *et al.*,
Petitioners,

v.

THE COMMONWEALTH OF
PENNSYLVANIA, THOMAS CORBETT,
Governor, and CAROL AICHELE,
Secretary of the Commonwealth,
Respondents.

Case No. 330 MD 2012

DECLARATION OF EVELYN GINENSKY

I, Evelyn Ginenksy, hereby declare as follows:

1. I am 91 years old and otherwise competent to testify.
2. I am a resident of Philadelphia. I am registered to vote in Pennsylvania and otherwise meet the qualifications for voting, namely, I am over the age of 18, a U.S. citizen, and have lived in Pennsylvania for more than 30 days. I intend to vote in person in the election of November 6, 2012. I am not indigent.
3. I moved to Philadelphia from New York City seven years ago. My New York driver's license expired, and I never obtained a Pennsylvania driver's license or any other form of PennDOT photo ID. My passport expired several years ago, and I have no idea where it is located. I have not been asked for a photo ID for as long as I can remember. I have no other form of photo ID that would enable me to vote under Pennsylvania's new voter ID law.
4. I am confined to a wheelchair. I employ aides twenty-four hours per day, seven days per week to assist me in my daily needs, including dressing and bathing. My polling place is in my apartment building, so I would be able to vote in person if I were not required to present a photo ID.

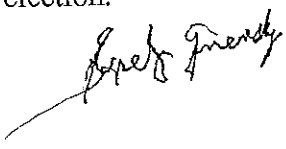
5. Whenever I have to travel from my residence, I have to hire a specially equipped vehicle to transport me in my wheelchair. My last such trip, to a physician, cost me approximately \$100. I have no other form of transportation.

6. My only form of income consists of Social Security and New York State disability payments.

7. I do not have my New York birth certificate, and I do not have access to the Internet to obtain one.

8. I have voted in every Presidential election in the last seventy years, and I am vitally interested in voting in the 2012 election.

Dated: Sept 24, 2012



Evelyn Ginensky

VIVIETTE APPLEWHITE, *et al.*,
Petitioners,

v.

THE COMMONWEALTH OF
PENNSYLVANIA, THOMAS CORBETT,
Governor, and CAROL AICHELE,
Secretary of the Commonwealth,
Respondents.

Case No. 330 MD 2012

DECLARATION OF MILTON GOLDSON

I, Milton Goldson, hereby declare as follows:


1. I am over the age of 18 and otherwise competent to testify.
2. I am a resident of Norristown, Pennsylvania.
3. I live at 330 Walnut St., Apt. 424, PA 19401.
4. I have diabetes and a defibulator, and it is extremely hard to get around.
5. I usually use a motorized wheelchair. When I leave the building, however, I use a walker.
6. I have been registered to vote for many years and I have always voted in person. I will continue to vote in person as long as I can.
7. My polling location is not far from my house. My good friend, Dorothy Sonntag, will drive me to the polling location.
8. On August 20, 2012, Dorothy Sonntag, took me to the Norristown PennDOT to get an ID for voting purposes. My old ID expired in February 2012, and because I knew I needed an ID to vote, I went to renew my ID.
9. That day, I waited for at least 2.5 hours to get my ID. I had to shuttle between two buildings, which is extremely hard for me because I have to use a walker.

10. Initially, a PennDOT employee told Dorothy that I would need a \$13.50 money order to obtain my photo ID. Dorothy and I went to get a money order from Rite Aid on Route 202. In the end, I did not have to pay.

11. I do not think I would have gotten an ID if Dorothy was not with me that day because the process was very complicated and confusing.

12. I declare that the facts set forth above are true and correct to the best of my knowledge, information and belief and are made subject to the penalties of 18 P.S. § 4904 relating to unsworn falsification to authorities.

Dated: September 23, 2012


(Signature)

Milton Goldson

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

VIVIETTE APPLEWHITE, *et al.*,
Petitioners,

v.

THE COMMONWEALTH OF
PENNSYLVANIA, THOMAS CORBETT,
Governor, and CAROL AICHELE,
Secretary of the Commonwealth,
Respondents.

Case No. 330 MD 2012

DECLARATION OF ETHEL HUGHES

I, Ethel Hughes hereby declare as follows:

1. I am over the age of 18 and otherwise competent to testify.
2. I am a resident of Birdsboro, Pennsylvania in Berks County.
3. I am registered to vote in Pennsylvania and otherwise meet the qualifications for voting, namely, I am over the age of 18, a U.S. citizen, and have lived in Pennsylvania for more than 30 days.
4. The statement contained in Exhibit 1, attached hereto, was freely made by me and is, to the best of my knowledge, information and belief, true and accurate.
5. I declare that the facts set forth above are true and correct to the best of my knowledge, information and belief and are made subject to the penalties of 18 P.S. § 4904 relating to unsworn falsification to authorities.

Dated: 9-22-12

Ethel M. Hughes
(signature)

Ethel M. Hughes
(printed name)

EXHIBIT 1

PERSONAL STATEMENT OF ETHEL HUGHES

1. I am an adult resident of Birdsboro, in Berks County Pennsylvania. I live at 146 Hook Street, Birdsboro.
2. I have a friend in Birdsboro, Margaret Maccarone, who has never driven, and I drive her around when she needs a ride.
3. Margaret is registered voter. She is 89-years old and votes regularly. Her polling place is at St Marks Church in Birdsboro, about one-half mile from her home.
4. I will drive her to the polling place in November if she asks me for a ride.
5. Margaret and her niece filled out the application form for a PennDOT photo ID that they had received from PennDOT. I agreed to take Margaret to PennDOT so that she could obtain a photo ID.
6. On September 6, 2012, I drove Margaret to the PennDOT Driver's License Center in Shillington, Pennsylvania so that she could apply for a photo ID.
7. Margaret brought her birth certificate and several bills to show her residency. She did not have her Social Security card.
8. When we arrived, we talked to a clerk right away. I told the clerk that Margaret wanted a voter ID card.
9. Margaret showed her the application, and her birth certificate and the bills that showed her residency. The clerk had a checklist and asked Margaret for certain things.
10. The clerk reviewed the application, Margaret's birth certificate and bills. All of these documents were acceptable.

11. The clerk asked Margaret for her Social Security card. Margaret was looking through her wallet for her card. Margaret did not have her card, so she presented her Medicare Card which has her Social Security number printed on it.

12. The clerk told us that the Medicare card was not acceptable.

13. Margaret and I sat down on some chairs and Margaret started looking through her wallet to try to find her Social Security card. Margaret could not find it.

14. . The clerk told us we would have to drive into the city of Reading to the Social Security Administration to get a new Social Security card. The clerk gave us a piece of paper telling us where the office was.

15. Since I am 81 years old and uncomfortable driving into Reading when I'm not sure where I am going, I took Margaret home.

16. The clerk did not tell us that Margaret could have received a photo ID just for voting. On September 6, 2012, I was not aware that a special ID just for voting was available. I don't think that Margaret knew about the voter ID. Neither Margaret nor I asked the clerk about that kind of ID. Since then, I read about the other ID in the newspaper.

17. Margaret recently found her Social Security card. I told Margaret that I would bring her back to PennDOT to try to get an ID.

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

VIVIETTE APPLEWHITE, *et al.*,
Petitioners,

v.

THE COMMONWEALTH OF
PENNSYLVANIA, THOMAS CORBETT,
Governor, and CAROL AICHELE,
Secretary of the Commonwealth,
Respondents.

Case No. 330 MD 2012

DECLARATION OF KATHERINE KNAPP

I, Katherine Knapp, hereby declare as follows:

1. I am over the age of 18 and otherwise competent to testify.
2. I am a U.S. citizen and I have lived in Pennsylvania for more than 30 days.
3. I intend to vote in person in the election of November 6, 2012.
4. I recently received in the mail an application from PennDOT to renew my Pennsylvania driver's license. After completing and mailing back the application, I received a camera card to take to PennDOT to obtain my new license.
5. On Monday, September 17, 2012 at around 11:30 a.m., I traveled to the PennDOT Photo & Exam Center located at 801 Arch Street Philadelphia, PA 19107 to have my photograph taken for my driver's license renewal.
6. I intend to use my renewed PennDOT driver's license as photo identification for voting purposes.
7. When I entered the PennDOT center, a PennDOT employee directed me into line behind many others attempting to obtain identification for voting.

8. I was one of the few applicants in the center who was fortunate enough not to have to wait for an extended period of time, but only because I already held a Pennsylvania driver's license.

9. PennDOT did not ask me to provide my birth certificate, Social Security card, or two proofs of residency, because I already held a Pennsylvania driver's license.

10. During my time waiting in line at the PennDOT center, I observed how several individuals applying for photo ID for voting were turned away and unable to obtain identification because of an incorrect form or the need for alternative proof of identification.

11. First, I witnessed a man who had taken off work to help his elderly mother obtain a photo ID card.

12. The elderly woman was turned away because she was missing one of the appropriate documents. She explained that the PennDOT website was confusing.

13. The son then asked the PennDOT employee for the form for the Department of State ID since his mother was unable to obtain the PennDOT ID.

14. The PennDOT employee stated that the PennDOT representative in charge of authorizing the Department of State ID was not in the facility on that particular day and they would need to come back at another time.

15. The son explained he could not keep taking off work to try to help his mother obtain an ID just so she could exercise her right to vote.

16. The son and elderly mother left the facility empty-handed, without an ID.

17. Additionally, I observed another man enter the facility and ask a PennDOT employee what forms of identification were needed to obtain the Department of State ID. The PennDOT employee's response was: I do not know, and you will have to check the website.

18. I saw a mother with two young children enter the facility. But after facing the growing line ahead of her, she left without obtaining an ID.

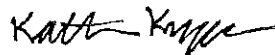
19. I was appalled to see so many people being turned away in this urban PennDOT location.

20. When I returned home, I looked on the PennDOT website to see whether there was any indication that a Department of State ID could be obtained only on certain days. There was no indication that a Department of State ID could not be obtained on all open business days.

21. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Dated: 22 Sept 2012

Katherine Knapp



VIVIETTE APPLEWHITE, *et al.*,
Petitioners,

v.

THE COMMONWEALTH OF
PENNSYLVANIA, THOMAS CORBETT,
Governor, and CAROL AICHELE,
Secretary of the Commonwealth,
Respondents.

Case No. 330 MD 2012

DECLARATION OF THERESA KUKOWSKI

I, Theresa Kukowski, hereby declare as follows:

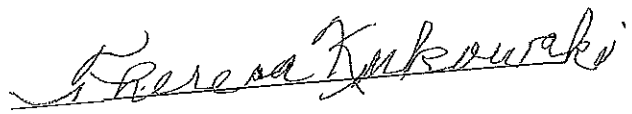
1. I am 62 years old and otherwise competent to testify.
2. I am a resident of Philadelphia, Pennsylvania.
3. I live in a house at 2224 Napfle Street with my husband, Richard, of 31 years. I am a regular voter, voted in the 2008 Presidential election, and intend to vote in the election this November.
4. I have been diagnosed with Multiple Sclerosis for the past 16 years and am currently confined to a wheelchair. It is especially hard for Richard to transfer me from my wheelchair into our 17-year-old minivan. I once had a Pennsylvania driver's license, but I stopped driving about five years ago, and my license has been expired for a few years. I don't have any other form of photo identification that I can present at the polls in November.
5. Our polling place is about 1 ½ blocks away from our house. When we vote, my husband pushes me in my wheelchair from our house to the polling place. It takes about 5 minutes for us to get there.
6. I had heard something about the new voter identification law a while back, but I did not realize that I would be affected by the law until September 22, 2012, when I received a notice in the mail about the new law. That notice is attached as Exhibit 1 to this Declaration.

7. Traveling to a PennDOT center to get an ID in the short amount of time before this November's election would be very difficult. The closet PennDOT center is on Oxford Avenue in Philadelphia, which is more than two miles away and too far for Richard to push me there in my wheelchair. If at all possible, I will try to have Richard take me in the car to the PennDOT before Election Day, but it would be very difficult—especially because we hear that there are long lines at the PennDOT center

8. Voting is very meaningful to me. It is my voice about the future of this country. In particular, the issues of Medicare and Medicaid are important to me, because, without these programs, it would be impossible for Richard and me to make ends meet.

9. I declare that the facts set forth above are true and correct to the best of my knowledge, information and belief and are made subject to the penalties of 18 P.S. § 4904 relating to unsworn falsification to authorities.

Dated: September 23, 2012



Theresa Kukowski

THERESA KUKOWSKI
Theresa Kukowski (printed)

IF YOU WANT TO VOTE SHOW IT.

Pennsylvania
visitPA.com

001


DRIVER'S LICENSE

No: 99 000 423 Dups: 00
DOB: 04/27/1951 Sex: F
Class: C Eyes: BRO
Endorse: --- Height: 5'05"
Com/Med Rstr: */1
Issued: 03/04/2011
Expires: 04/28/2015

ORGAN DONOR

GRACE SMITH
123 MAIN STREET
HOMETOWN PA 12345

Grace Smith



DL

(with supporting documentation)

Acceptable photo IDs include:

- **Municipal governments**

Learn more. Visit votesPA.com

P.O. BOX 0115,
Harrisburg, PA 17106-1137

PERMIT NO. 5605

AUTO**S-DIGIT 19152
KUKOWSKI RESIDENCE
OR CURRENT RESIDENT 1743 P1
2224 NAPLE ST
PHILADELPHIA PA 19152-3712

VIVIETTE APPLEWHITE, et al.,
Petitioners,

v.

THE COMMONWEALTH OF
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Respondents.

Case No. 330 MD 2012

DECLARATION OF SUE MADWAY LEVINE, Ed.D.

I, Sue Madway Levine, hereby declare as follows:

1. I am over the age of 18 and otherwise competent to testify.
2. I live at 411 Lilac Drive, Kennett Square, PA in Chester County.
3. I hold a Doctorate degree in Education, teach education and I am the author of several children's books.
4. I am a volunteer who has been trying to help voters get photo ID for voting before the November election. I have taken the initiative to educate myself on what is required and how to best help people who need ID.
5. I read the training manual prepared by the Pennsylvania Voter ID Coalition and the Committee of Seventy and went to a non-partisan training event.
6. The training materials revealed that voters who had previously held a PennDOT ID might be in the PennDOT system and could get a new ID without further documentation. However, these voters were advised to call 1-800-932-4600, PennDOT's customer service center, to determine if they were already in PennDOT's system.
7. Before I started calling registered voters, I wanted to make certain that the PennDOT database check worked.

8. On Wednesday morning, September 19, 2012, I called PennDOT's customer service center. First, there is no prompt for a caller to press a button to speak to a representative. There is no prompt to verify that a person is in the PennDOT database. There is also no prompt for voter ID.

9. After listening the first time and not finding an appropriate prompt, I hung up and called back.

10. I listened to the prompts again all the way through and decided to press the number for a driver's license. I listened 2-3 minutes to the information and eventually the recording directed you to a prompt if you need a photo ID for voting purposes. I pressed that prompt, although I was calling to verify that I was in the PennDOT database.

11. To my chagrin, I had to listen to lengthy instructions regarding what documentation was necessary to bring to PennDOT to obtain a photo ID. This took at least an additional five minutes.

12. At the end of the instructions, there was no additional prompt to verify if you were in the database or to speak to a representative. There was no information at all to help someone verify if they were in the database.

13. I decided to try to push "0" to see if that would help and someone named "Michael" answered the phone.

14. I explained to him that I was a non-partisan volunteer who wanted to verify that voters were in the PennDOT system, because they had previously held a Pennsylvania driver's license or non-driver photo ID. I was told that if you had your name and your birthdate, you could verify that you were in the system.

15. Michael asked me for my driver's license number. I told him that I didn't want to give my driver's license number because I was trying to see if someone who just had a name and birthdate could be verified in the system.

16. Michael told me "we don't do that."

17. I told him "You are supposed to." Michael asked me again to give my driver's license number. I asked him to pretend that I don't have a driver's license, that I lost it and to try to find me using just my name and birthdate. He then put me on hold.

18. I waited about 2 minutes and Michael returned and then asked me for my name and birthdate. He was able to confirm my address and verified that I was in the system. At that point, I asked to speak to a supervisor because I felt that someone less informed than me would not have figured out how to get to a person to verify their status.

19. I was placed on hold. My husband held the line because I had to take another call. Michael returned and told my husband that we would hear from a supervisor by Friday. My husband hung up.

20. I was very frustrated with the results of the call. The entire process took between 20 and 30 minutes.

21. Later that day, a person named "Eric Alsyan" from PennDOT called me. He apologized that the prompts did not take me to the correct place. He promised that he would try to get those prompts fixed. He gave me his personal email so that I could email him the name and birthdate of people I needed to verify.

22. I have not had an opportunity to send him any names and birthdates or to see if the email will streamline the process. I was lucky enough to obtain this backdoor route for verifying people in the database. I am not aware of any other publication that provides an email address to verify status in PennDOT's database.

23. I am concerned that people with less knowledge than I have will not be able to navigate the PennDOT toll-free number to verify their status. This might result in numerous trips to a drivers'

license center to get ID to vote if a person erroneously believes that he or she is already in the system and goes to PennDOT without documentation.

24. I declare that the facts set forth above are true and correct to the best of my knowledge, information and belief and are made subject to the penalties of 18 P.S. § 4904 relating to unsworn falsification to authorities.

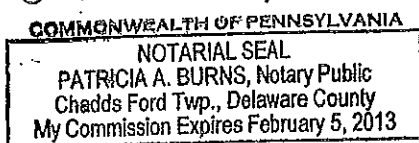
Dated: September 24, 2012

Sue Madway Levine
(Signature)

Sue Madway Levine
Sue Madway Levine

Sworn to and subscribed before me
this 24 day of Sept. 2012.

Patricia A Burns



IN THE COMMONWEALTH COURT OF PENNSYLVANIA

VIVIETTE APPLEWHITE, *et al.*,
Petitioners,

v.

THE COMMONWEALTH OF
PENNSYLVANIA, THOMAS CORBETT,
Governor, and CAROL AICHELE,
Secretary of the Commonwealth,
Respondents.

Case No. 330 MD 2012

DECLARATION OF PETITIONER NADINE MARSH

I, Nadine Marsh, hereby declare as follows:

1. I am over the age of 18 and otherwise competent to testify.
2. I am registered to vote in Pennsylvania and otherwise meet the qualifications for voting, namely, I am over the age of 18, a U.S. citizen, and have lived in Pennsylvania for more than 30 days.
3. I am a petitioner in this action and I testified via video deposition on the first day of the trial. Trial Transcript, July 25, 2012, at 179-198.
4. I was born on March 8, 1928, in Sewickley, which is in Allegheny County, Pennsylvania.
5. I have no photo ID that will allow me to vote on November 6.
6. I have never driven or had a PennDOT ID, so I needed a raised-seal birth certificate, social security card and two proofs of residence to get a non-driver PennDOT ID in order to vote.

7. I have been unable to obtain a PennDOT ID because I do not have a birth certificate and the Department of Health notified me in May, by a document dated May 16, 2012, that they have no record of my birth. Ex. 12, page 3 (from first trial).

8. I want to vote so I have continued to try to get an ID that will allow me to do so in November.

9. In August I learned that the Commonwealth would be issuing a new form of ID, known as the Department of State (DOS) Voter ID, and that I could get it without a birth certificate.

10. My granddaughter, Suzanne Smith, knows how to use the Internet and she researched what documents I needed to get the DOS ID.

11. Based on her research, she learned that I would need to two present acceptable proofs of residency.

12. Since I live with my daughter, Barb Smith, I do not get any bills that show my address.

13. Neither Suzanne nor I could tell if I had the necessary documents to get a DOS ID so on August 25 Suzanne sent an email to the Department of State help line, RA-VOTERIDQUESTIONS@PA.GOV. A copy of the August 25 e-mail is attached as Exhibit 1.

14. Suzanne stated in the email that she could not find a complete list of acceptable proofs of residency. The closest she found was the following:

When requesting these IDs, voters will need to affirm they do not possess any other approved identification for voting purposes. They will be asked to provide two proofs of residence, such as a utility bill, along with their date of birth and Social Security number, if the customer has an assigned number. PennDOT will validate the voter registration status with the Department of State while the voter is in the PennDOT office. Upon confirmation of this information, the voter will be issued the voter card before leaving the PennDOT facility. (Emphasis in original).

She then asked for a "FULL list of acceptable types of 'proof of residency...'" because the "such as" in the above-referenced paragraph was "too vague."

15. After three days, Suzanne still had not received a reply from DOS.

16. On August 28, Suzanne sent a second email asking DOS to respond, and adding a question about whether I would have to take two trips to DMV. A copy of the August 28 e-mail is attached as Exhibit 2.

17. Two more days passed and Suzanne still had not gotten a response from DOS.

18. On August 30, Suzanne sent a third e-mail, forwarding her earlier ones, asking for a response. A copy of the August 30 e-mail is attached as Exhibit 3.

19. Later that day, on August 30, Suzanne received a response saying that I can fulfill the requirements if I bring a "Verification of Residence Affirmation" form (which was attached) filled out by someone who can say where I live, along with a "bank statement." A copy of the August 30 DOS response is attached as Exhibit 4.

20. I got very sick right after Suzanne received the response and I was unable to leave the house for a couple of weeks.

21. I felt better by the weekend of September 15, so I decided it was time to try again to get my ID.

22. The closest Licensing Bureau is in Rochester, which is more than 20 miles away from my home and takes about forty minutes to drive there. See Exhibit 5, mapquest printout of directions.

23. Because such a trip is difficult for me, we wanted to be sure we went to the Bureau on a day that I could get my ID. My granddaughter searched the PennDOT website and

found that the Rochester office is open from 8:15 to 4:30 on Mondays. See Exhibit 6, website printout of East Rochester PennDOT Driver License Center.

24. Based on the information, on Monday, September 17, my daughter Barb, who had a day off from work, drove me the 40 minutes to the East Rochester Licensing Center. I had all the papers I thought I would need to get the ID.

25. Even though the PennDOT office was open, they told me that the Licensing desk is not open on Mondays, so I was unable to obtain a DOS ID. We made the 40 minute drive home without getting an ID.

26. Since Barb was again off from work the next day, Tuesday, September 20, she and I made a second trip, yet again driving the forty minutes to the Rochester DMV.

27. After waiting in line for about twenty minutes, Barb and I worked with a PennDOT clerk who did not seem to understand about the DOS ID and had to ask her supervisor many questions.

28. Even though I had the two proof of residency forms the DOS help desk had told Suzanne I needed in their August 30 e-mail, the completed "Verification of Residence Affirmation" form and my bank statement with the home address on it, PennDOT refused to issue me a DOS ID.

29. I was told that PennDOT needed to "process" the application and that I should go home and "Harrisburg" would notify me when I could come back to get my DOS ID.

30. I was not given a receipt or any other document verifying my application.

31. In addition to the twenty minute wait, I spent an hour working with this lady and I still did not get a voter ID. The clerk could not tell me what document I would be getting in the mail from Harrisburg or when I would receive it. When I expressed concern about how long it

would take, the clerk alerted me to the fact that I needed to return with the document before October 9, which she said was the deadline to get a voter ID.

32. The drive home took another forty minutes.

33. As of this date, September 23, I still have not heard anything from either PennDOT or DOS about getting my ID. As of this date I have no ID to vote, despite taking two trips to a DMV, and have no idea how or if I will be able to get an ID to vote in November.

34. I declare that the facts set forth above are true and correct to the best of my knowledge, information and belief and are made subject to the penalties of 18 P.S. § 4904 relating to unsworn falsification to authorities.

Dated: 9-23-18

Nadine M. Marsh
(signature)

NADINE M. MARSH
(printed name)

From: Smith, Suzanne
Sent: Saturday, August 25, 2012 7:39 AM
To: 'RA-VOTERIDQUESTIONS@pa.gov'
Subject: Proof of residency

I am helping my elderly grandmother, who is unable to obtain a copy of her birth certificate, obtain a voter ID.

Despite searching numerous websites, I am unable to locate a list of acceptable proof of residency documents.

The closest I found was this paragraph:

When requesting these IDs, voters will need to affirm they do not possess any other approved identification for voting purposes. They will be asked to provide two proofs of residence, such as a utility bill, along with their date of birth and Social Security number, if the customer has an assigned number. PennDOT will validate the voter registration status with the Department of State while the voter is in the PennDOT office. Upon confirmation of this information, the voter will be issued the voter card before leaving the PennDOT facility.

The problem is my grandmother resides with her daughter. Utility bills do not come in her name. Does correspondence from Medicare count/ Social Security? A bank statement? A commercial credit card? Correspondence from a DR? Insurance statements?

Please provide a FULL list of acceptable types of "proof of residency." The "Such as" in the above statement language is very vague. Our DMV is over 20 miles from home and making numerous trips, due to lack of clarity about acceptable proof, is burdensome to say the least.

I would also suggest that you make this list easily available on your website as well.

I look forward to your prompt response.

Suzanne Smith
Registered Voter.

Marsh Ex. 1

From: Smith, Suzanne
Sent: Tuesday, August 28, 2012 5:45 AM
To: 'RA-VOTERIDQUESTIONS@pa.gov'
Subject: RE: Proof of residency - 2nd request

Dear 'RA-VOTERIDQUESTIONS@pa.gov',

This is my 2nd email.

Have not received a response regarding the below email.

I will also take the opportunity to inquire if my grandmother may need to go to DMV twice.
Once for the official notification that her birth certificate cannot be located and a second time to get the ID.

Please advise asap.

Suzanne

From: Smith, Suzanne
Sent: Saturday, August 25, 2012 7:39 AM
To: 'RA-VOTERIDQUESTIONS@pa.gov'
Subject: Proof of residency

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The problem is my grandmother resides with her daughter. Utility bills do not come in her name.
Does correspondence from Medicare count/ Social Security? A bank statement? A commercial credit card? Correspondence from a DR? Insurance statements?

Please provide a FULL list of acceptable types of "proof of residency." The "Such as" in the above statement language is very vague. Our DMV is over 20 miles from home and making numerous trips, due to lack of clarity about acceptable proof, is burdensome to say the least.

I would also suggest that you make this list easily available on your website as well.

I look forward to your prompt response.

Suzanne Smith
Registered Voter.

Marsh Ex. 2

From: Smith, Suzanne
Sent: Thursday, August 30, 2012 8:50 AM
To: 'RA-VOTERIDQUESTIONS@pa.gov'
Subject: RE: Proof of residency - 3rd request

This is my 3rd request for information.
Please advise on below issue.
Suzanne

From: Smith, Suzanne
Sent: Saturday, August 25, 2012 7:39 AM
To: 'RA-VOTERIDQUESTIONS@pa.gov'
Subject: Proof of residency

I am helping my elderly grandmother, who is unable to obtain a copy of her birth certificate, obtain a voter ID.

Despite searching numerous websites, I am unable to locate a list of acceptable proof of residency documents.

The closest I found was this paragraph:

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The problem is my grandmother resides with her daughter. Utility bills do not come in her name. Does correspondence from Medicare count/ Social Security? A bank statement? A commercial credit card? Correspondence from a DR? Insurance statements?

Please provide a FULL list of acceptable types of "proof of residency." The "Such as" in the above statement language is very vague. Our DMV is over 20 miles from home and making numerous trips, due to lack of clarity about acceptable proof, is burdensome to say the least.

I would also suggest that you make this list easily available on your website as well.

I look forward to your prompt response.

Suzanne Smith
Registered Voter.

Marsh Ex 3

From: Smith, Suzanne
Sent: Thursday, August 30, 2012 12:45 PM
To: 'ST, VoterID Questions'
Subject: RE: Proof of residency - 3rd request

Thank you!!!!

From: ST, VoterID Questions [<mailto:RA-voteridquestions@pa.gov>]
Sent: Thursday, August 30, 2012 12:18 PM
To: Smith, Suzanne
Subject: RE: Proof of residency - 3rd request

Our apology for the slow response. I have attached a Verification of Residence Affirmation form that can be completed by your grandmother and another person who will affirm her residency. With this completed form and a copy of her bank statement it will fulfill the proof of residency documents she will need.

This form can also be found under the www.votespa.com website under the Voter ID link.

From: Smith, Suzanne [<mailto:ssmith@crivellawest.com>]
Sent: Thursday, August 30, 2012 8:50 AM
To: ST, VoterID Questions
Subject: RE: Proof of residency - 3rd request

This is my 3rd request for information.
Please advise on below issue.
Suzanne

From: Smith, Suzanne
Sent: Saturday, August 25, 2012 7:39 AM
To: 'RA-VOTERIDQUESTIONS@pa.gov'
Subject: Proof of residency

I am helping my elderly grandmother, who is unable to obtain a copy of her birth certificate, obtain a voter ID.

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Marsh Ex 4

The problem is my grandmother resides with her daughter. Utility bills do not come in her name. Does correspondence from Medicare count/ Social Security? A bank statement? A commercial credit card? Correspondence from a DR? Insurance statements?

Please provide a FULL list of acceptable types of "proof of residency." The "Such as" in the above statement language is very vague. Our DMV is over 20 miles from home and making numerous trips, due to lack of clarity about acceptable proof, is burdensome to say the least.

I would also suggest that you make this list easily available on your website as well.

I look forward to your prompt response.

Suzanne Smith
Registered Voter.



145 Sandy dr clinton pa 15026

145, 149 Stewart Ave, Rochester, PA 150

Options

Get Directions

Suggested Routes

PA-18
38 mins / 22.55 miles
Est. Fuel Cost
Calculate
1-376 W
39 mins / 24.87 miles
Est. Fuel Cost
Calculate

Or you can adjust your route by dragging the Route Line

Driving Directions

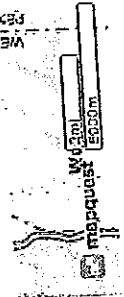
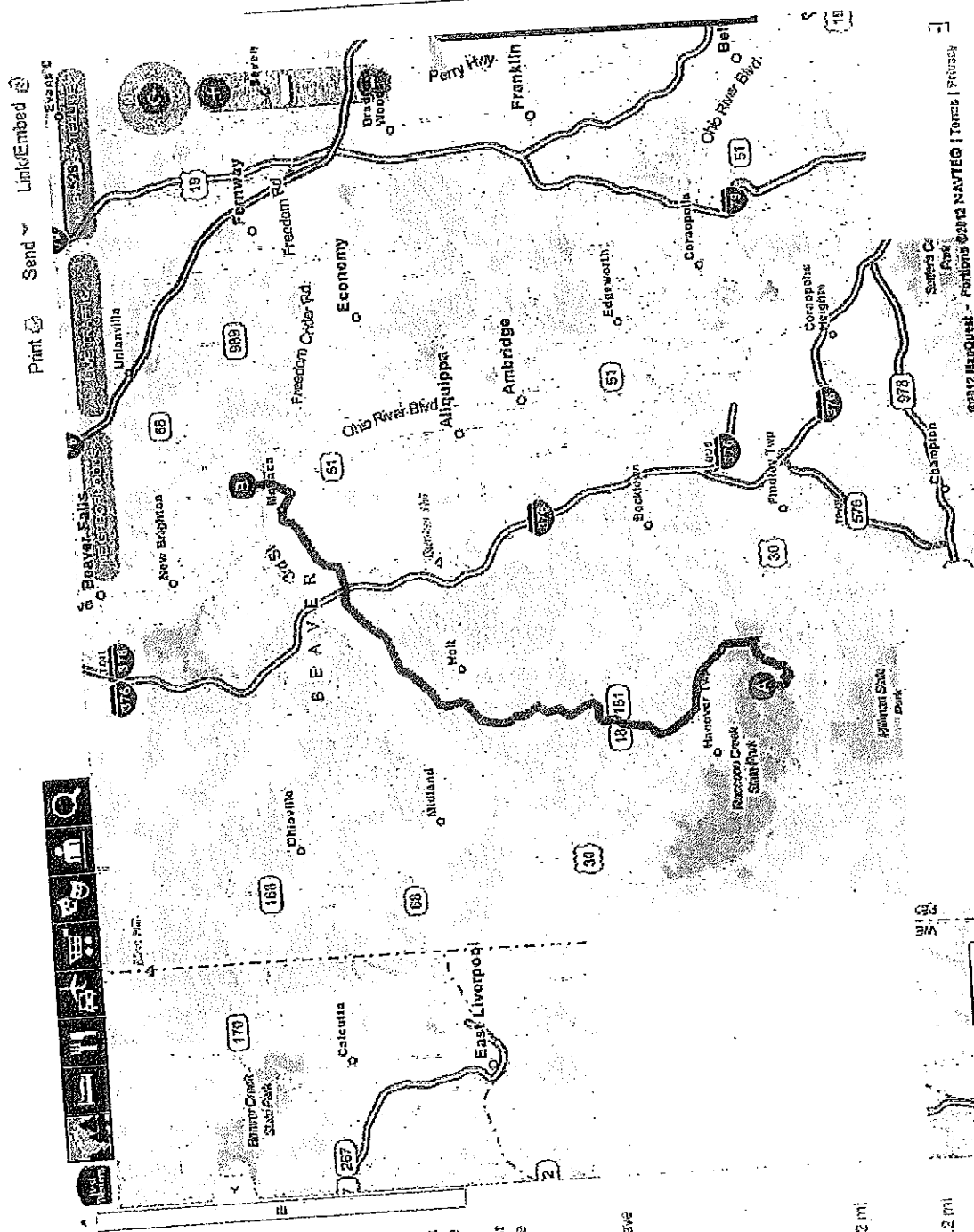
145 Sandy Dr
Clinton, PA 15026-1325
Add a Note Search Nearby Zoom

Online Offers: Hotels in Clinton

I know this area, hide the first four steps

1. Start out going southeast on Sandy Dr toward Rogers Dr. 0.2 mi
2. Turn right onto Rogers Dr. 0.2 mi
3. Turn left onto Anderson Rozak Rd. 1.7 mi
4. Turn left onto US-30. 4.0 mi

Marsh EX 5



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Address of Rochester DMV

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Contact Information

Phone:

(800) 932-4600



Hours of Operation

Sunday
Monday
Tuesday
Wednesday
Thursday
Friday
Saturday

Closed
8:30am - 4:15pm
8:30am - 4:15pm
8:30am - 4:15pm
8:30am - 4:15pm
8:30am - 4:15pm
8:30am - 4:15pm

Holidays:

Closed on New Year's Eve and New Year's Day (or following Monday if holiday falls on weekend), Martin Luther King, Jr. Day, Presidents' Day, Memorial Day, Independence Day, Labor Day, Columbus Day, Veterans Day, Thanksgiving Day and the following Friday, Christmas Day.

Appointments:

This branch accepts appointments.

Please note that the hours for the Photo License Center and the Driver License Center might differ even though they are located in the same building. Please make sure you are on the right page for the center in

Marsh EX 6

which you wish to visit.

Please call to confirm your branch hours and services before visiting.
Some offices hours may change without notice.

More Information:

Driver's Notes:

Appointments are required for road tests. Call 1-800-932-4600.

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IN THE COMMONWEALTH COURT OF PENNSYLVANIA

VIVIETTE APPLEWHITE, *et al.*,
Petitioners,

v.

THE COMMONWEALTH OF
PENNSYLVANIA, THOMAS CORBETT,
Governor, and CAROL AICHELE,
Secretary of the Commonwealth,
Respondents.

Case No. 330 MD 2012

DECLARATION OF (NAME)

I, Cheryl Ann Moore, hereby declare as follows:

1. I am over the age of 18 and otherwise competent to testify.
2. I am a resident of Philadelphia in Philadelphia County, Pennsylvania.
3. I am registered to vote in Pennsylvania and otherwise meet the qualifications for voting, namely, I am over the age of 18, a U.S. citizen, and have lived in Pennsylvania for more than 30 days.
4. The facts about me and my effort to get a voter ID contained in Exhibit 1, attached hereto, are true and accurate.
5. I declare that the facts set forth above are true and correct to the best of my knowledge, information and belief and are made subject to the penalties of 18 P.S. § 4909 relating to unsworn falsification to authorities.

Dated: 9/22/2012

Cheryl Moon
(signature)

Cheryl Moore
(printed name)

The Washington Post

[Back to previous page](#)

Pa.'s new voter ID law sends non-drivers on a bureaucratic journey

By Ann Gerhart, Published: September 16

Philadelphia — Cheryl Ann Moore stepped into the state's busiest driver's licensing center, got a ticket with the number C809 on it and a clipboard with a pen attached by rubber band, and began her long wait Thursday to become a properly documented voter.

Six blocks away, inside an ornate and crowded City Hall courtroom, a lawyer was arguing before the Pennsylvania Supreme Court that the state's controversial new voter ID law would strip citizens of their rights and should be enjoined. Just outside, on Thomas Paine Plaza, the NAACP president was inveighing against a modern-day poll tax at a boisterous rally of a few hundred opponents.

Moore bent over a folding table and carefully filled out the form a Pennsylvania Department of Transportation worker had given her, in the first line she would stand in that day. Her ticket was time-stamped 11:38 a.m. and gave an estimated wait time of 63 minutes, which, said Moore, didn't seem so bad.

She had been registered to vote since she was 19, and now she was 54.

"I'm on vacation this week," she said, "so I thought, 'Let me just get this done now,' because by the time we get to November, you won't be able to get in this place."

She looked around. Nearly all of the 200 plastic chairs in the long room were filled with her fellow citizens — people trying to get licenses to drive mixed in with people trying to get licenses to vote. The bin on the wall that held applications for the "Pa. voting ID" was empty.

When the state's legislature in March enacted one of the toughest ID laws in the nation, with the support of no Democrats and all but three Republicans, Gov. Tom Corbett (R) said it would "prevent people from cheating in our elections" in a state where Democrats have a registration advantage of 1.1 million people. The Republican majority leader, Mike Turzai, then boasted that the new law "is going to allow Governor Romney to win" the state, which inflamed an already charged debate.

The governor estimated that 99 percent of the state's 8.3 million voters already had an acceptable PennDOT ID, and other Republicans questioned how any responsible grown-up wouldn't already have the right card, in a society where photo ID is required to use a credit card or buy alcohol or cash a check.

Cheryl Ann Moore was such a grown-up.

The connection was reset

The connection to the server was reset while the page was loading.

- The site could be temporarily unavailable or too busy. Try again in a few moments.
- If you are unable to load any pages, check your computer's network connection.
- If your computer or network is protected by a firewall or proxy, make sure that Firefox is permitted to access the Web.

C.M.

She owns her home, a small rowhouse in South Philadelphia. She's held the same job for 24 years, as a custodian at Thomas Jefferson University Hospital, where she works the 4-a.m.-to-noon shift. To get there, she takes the bus in the middle of the night. She doesn't have a driver's license, like thousands of working people in a city with one of the lowest rates of car ownership in the country.

She doesn't have a bank account. "I pay cash or do layaway," said Moore. "No credit cards; they're dangerous."

On Thursday, she slept in, until about 7 a.m., then got herself dressed to spend the day in Center City in a pair of pressed gray capris, a pink-and-white T-shirt and a pair of pink patent leather sandals.

She stopped at work to pick up the paycheck she gets every two weeks, then went to cash it at the same place she's been going for years.

"They know me there," she said, "I don't need ID for that."

But she had heard on the news she needed ID to vote, even though "I never had no problem before," and her daughter, Sharia, who works in day care, had been pressing her. "She already has that non-driver license, so she told me I better get myself one." Figuring there would be a crowd at the center, she hadn't stopped for breakfast, and now it was 12:30 p.m., and she was hungry.

On the electronic board overhead, the number being served was C765, so Moore went to Subway and got lunch. There were no more chairs, so she sat down on a heating vent at the back of the room.

Paper chase

There has been confusion for six months about how many registered voters do not have proper ID and about how exactly they can acquire it.

Opponents of the new law have asked the state Supreme Court, which currently has six members (a seventh justice was suspended this year on corruption charges), split evenly among Democrats and Republicans, to block it. The court is expected to rule this month, and some of the justices' questions on Thursday showed concern that voters might not be able to get their papers in order before Election Day. The latest poll, conducted by the Philadelphia Inquirer, indicates that some 65 percent of Pennsylvania voters support the law. The same poll shows Obama leading Romney by 11 points in the state.

Meanwhile, the voting-access groups have banded together to try to educate the citizenry

The law initially stipulated that the only acceptable proof of identity at the polls was a driver's license or what PennDOT calls the "non-driver" card. Both required a raised-seal birth certificate from the state and a Social Security card, as well as two proofs of residency.

The law later was amended to include a narrow set of other photo IDs: a U.S. passport; an ID issued by local, county, state or federal government; a military ID; an ID from an institute of higher learning for students or employees; an ID from a state-recognized care facility, such as a nursing home. All had to have expiration dates.

Then the state had to define what constituted an institute of higher education, and it turned out that of 110 universities, 91 didn't include expiration dates on their IDs.

"I have a training manual I use, and I have rewritten it eight or nine times," said Ellen Kaplan, the policy director for the Committee of Seventy, a political watchdog group in Philadelphia.

Cm

Finally, on Aug. 27, with 10 weeks to Election Day, the state issued what it termed the "card of last resort."

To get one of those, a person had to first fill out form DL-54A, to apply for a PennDOT free photo ID for voting, then have a PennDOT staffer certify that the applicant did not have suitable documents to get that first ID, then sign an oath that he or she did not have another acceptable form of ID as stipulated by Pennsylvania Election Code Section 102 (z.5) (2), then fill out the Request for Initial Issuance of Pennsylvania Department of State Initial ID for Voting Purposes.

Perhaps 100,000 registered voters lack the right ID, although no one knows for sure; estimates have ranged from 1 to 11 percent of 8.3 million registered voters. Through Sept. 11, the state had issued 7,548 of the free non-driver IDs for voting, said PennDOT spokeswoman Jan McKnight, and 579 of the cards of last resort, 343 of those in Philadelphia — and one of those facilitated by McKnight herself, to the father of Jim Cramer, after the CNBC host complained via Twitter last Wednesday that his dad couldn't get ID.

'None of this makes any sense'

"This is a hot mess!" said Moore. "They want people to get out and vote, and none of this makes any sense!"

Pauline Broyaka, a native of Ukraine, was clutching her 1991 voter registration card. "I have no idea what I'm waiting for," said Broyaka. She had number C805.

Irwin Smith was back for a second day. He had showed up at 8 a.m. Monday, only to find out voter photos aren't taken on Mondays. Now he was back, holding his birth certificate and his Social Security card. The fact that he had held onto both, through decades of living on the street before he moved to a housing program four years ago, he saw as a sign he was intended to "be part of society again." He had number C814.

"This is ridiculous," said Moore. "We are all in this world together. We are as one. We are equal."

She looked at her watch. It was 1:10 p.m., she had been there for 90 minutes, and C773 was up. "I think I should go get a money order for \$13.50," the fee for the non-driver ID, she said. "I better have that just in case." She went around the corner to Liberty Market, fished out \$13.50 and another buck for the money order.

"Even if I don't need it, it pays to talk to people, and be prepared," she said.

At 1:42 p.m., Moore stepped up to one of the eight manned stations and presented her paperwork. Registered to vote? "Oh, yes," she said. "You want a voting ID?" asked the clerk. "Then you need to fill out this instead." Moore took another clipboard, and another two-page form. "I already answered most of this," she said.

A second clerk phoned the Philadelphia Board of Elections, and after a wait, verified she was, indeed, registered to vote. Ten minutes later, she directed Moore to print and sign her name on a sheet of paper labeled "Examiner's Report." She carefully detached her pay stub from the address page and offered her proof of residency. She swore her oath of affirmation.

At 2:10 p.m., she got a new ticket — A230 — for the photo line. At 3:25 p.m., after four hours, her number was called, and she scampered over to the camera, only to have the clerk take number A231 and the man standing behind her.

"Hey!" she said, "I'm right here!"

"I already called your number three times," he said. "Now what?" she demanded.

C.M.

"Take a new number," he said.

"This is bull-----!" she said. "At the end of all this?" She bit her lip.

At that, another clerk waved Moore to another camera and told her to smile.

With that, after four hours, Cheryl Ann Moore became the proud owner of a laminated Commonwealth of Pennsylvania Department of State for Voting Purposes Only ID card.

"I feel good!" she said. She grinned, kissed the card, put it inside a compartment in her knockoff Louis Vuitton purse and zippered it shut.

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CM,

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

VIVIETTE APPLEWHITE, *et al.*,
Petitioners,

v.

THE COMMONWEALTH OF
PENNSYLVANIA, THOMAS CORBETT,
Governor, and CAROL AICHELE,
Secretary of the Commonwealth,
Respondents.

Case No. 330 MD 2012

DECLARATION OF EMMA REBHORN

I, Emma Rebhorn, hereby declare as follows:

1. I am over the age of 18 and otherwise competent to testify.
2. I am a resident of Pittsburgh, Allegheny County.
3. I am employed as an Assistant General Counsel for the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union, AFL-CIO-CLC.

September 18, 2012

4. On Tuesday, September 18, 2012, I volunteered to participate in a voting rights action organized by the AFL-CIO and other community groups. Before the action, I had followed national and local news about Pennsylvania's new voter identification law, but I had not attended any specific training on the law's implementation or its requirements.

5. The action took place in downtown Pittsburgh, at the Pennsylvania Department of Transportation Driver License Center ("PennDOT") located at 708 Smithfield Street.

6. I arrived at the event at approximately 10 a.m., and I informed the organizers that I am an attorney. I told them that I was available to act as an advocate for voters who needed assistance obtaining identification.

7. At approximately 10:45 a.m., I met Jean Foreman, who told me that she was registered to vote but had no acceptable form of identification. She said that she had never held a Pennsylvania driver license or any other Pennsylvania Department of Transportation identification card. Mrs. Foreman said she had travelled to PennDot that morning and attempted to obtain voter identification but that a PennDOT clerk had told her she would need to visit the state Department of Health for a birth certificate before PennDOT would issue her an identification card.

8. I sat with Mrs. Foreman and Calvin Skinner, who was also participating in the action. Mrs. Foreman showed me a Comcast bill for cable service, which listed her address but misspelled her name as "Jean Forman."

9. Mr. Skinner provided Mrs. Foreman with a preprinted affirmation titled "Department of State ID for Voting Purposes/Proof of Residence Verification." Mrs. Foreman completed the top half of the affirmation, and a friend who had driven her to PennDOT that morning completed the bottom half, verifying that Mrs. Foreman resided at her address.

10. Another volunteer returned and provided Mrs. Foreman with two documents that contained information about her voter registration status. The first document was printed from pavoterservices.state.pa.us, and the second was printed from the website of an organization called the "Voter Activation Network."

11. Mrs. Foreman and I entered PennDOT with the following documents:

- a. her Comcast bill
- b. the Department of State Proof of Residence Verification
- c. her voter registration status from pavoterservices.state.pa.us
- d. her voter registration status from the Voter Activation Network

12. When we entered PennDOT, Mrs. Foreman took a slip of paper, which identified when she had arrived. Our paper assigned us the number 645. It indicated that we had entered at 11:46 a.m. and had an "estimated waiting time" of ten minutes.

13. When we sat down, the clerks were serving customer number 611.

14. In the waiting area, I noticed approximately six plastic containers that held informational documents and forms. Two of the containers were labeled with bright yellow paper and read "voter information" in capital letters. I took a copy of each of the documents in the two containers.

15. The cover of the first document, which was a packet of several pages, read "PENNSYLVANIA'S VOTER ID LAW/A Guide to ACT 18 of 2012" ("Guide") (emphasis in original). This document is attached as Exhibit 1 to this Declaration. The second document, which was only one page, was titled "Affirmation that Voter Does Not Possess Proof of Identification for Voting Purposes" ("Affirmation"). This document is attached as Exhibit 2 to this Declaration.

16. Mrs. Foreman and I read the Guide, specifically the "FAQ" that addressed the question, "What if a voter does not have an acceptable form of ID?" I thought that this applied to Mrs. Foreman. The Guide answered that: "A person who is registered to vote, but does not

have an acceptable form of ID, may obtain a FREE PENNDOT PHOTO ID for voting purposes at a PENNDOT Driver's License Center" (emphasis in original).

17. Because Mrs. Foreman did not have an acceptable form of ID, I thought that the "free PennDOT photo ID for voting" was what she needed. Further, I knew that Mrs. Foreman needed identification for voting purposes, and I knew from news coverage of the law that Pennsylvania residents who could not afford to pay were entitled to receive free photo identification.

18. Then Mrs. Foreman and I read the subsequent "FAQ," which addressed the question, "How does a voter obtain a FREE PENNDOT PHOTO ID for voting?" (Emphasis in original).

19. The text of the FAQ answer concerned me, because it indicated that, in order to receive free photo identification, Mrs. Foreman needed a Social Security Card and a certificate of citizenship, a certificate of naturalization, or a birth certificate with a raised seal. Mrs. Foreman only had her Social Security Card.

20. I told Mrs. Foreman that based on what we had read, there was a possibility she might not be able to get her voter identification that day. In response, she appeared frustrated and concerned. I felt the same way. I also felt confused, because I believed that the state intended the "free PennDOT photo ID" to serve as a "catch-all" for voters who would have difficulty providing the documents necessary to obtain a driver license, for example.

21. At or around 1 p.m., after we had been waiting for approximately 75 minutes, Mrs. Foreman's number, 645, flashed on an LCD screen in the waiting area and was announced over a loudspeaker. We were assigned to a desk of a certain number, which I believe was 4.

22. Mrs. Foreman and I walked to what I believe was desk 4. She sat down, and I knelt beside her.

23. We said hello, and the clerk responded by asking Mrs. Foreman, "Do you have a birth certificate?" She began to explain that she had never been issued a birth certificate. The clerk interrupted and said, "You'll need to see a manager." I told the clerk that all Mrs. Foreman wanted was state voter identification. The clerk responded, "You have to see a manager for those issues."

24. I asked the clerk who the manager was, and he pointed to a man seated at the desk next to him. The manager was currently serving a customer, and I asked the clerk if we should wait. He said we could wait near the manager's desk.

25. Mrs. Foreman walks with a cane, and I was concerned about her standing for too long, so I found her a chair and knelt beside it. After the manager finished serving the current customer and talked briefly with an additional person, he asked us to come to his desk.

26. The manager, whose nametag read Mr. Nash, asked Mrs. Foreman for her "documents." She gave him her Comcast bill; the Department of State Proof of Residence Verification; her voter registration status from pavoterservices.state.pa.us; and her voter registration status from the Voter Activation Network.

27. I began to explain the situation by telling the manager that Mrs. Foreman did not have a birth certificate, and that she desired an ID for voting purposes exclusively. Mr. Nash nodded, and looked at Mrs. Foreman's Comcast bill, which was at the top of the paperwork she had handed to him.

28. Mr. Nash told us that he needed to call the state to verify that Mrs. Foreman was registered to vote. I offered him the print-out from `pavoterservices.state.pa.us` verifying her status, but he said he needed to confirm her registration by phone, anyway.

29. Mr. Nash was on the phone for approximately ten minutes, although he appeared to be on hold and was not talking for part of that time. I could not hear what Mr. Nash was saying when he spoke.

30. After approximately nine minutes, I remembered that Comcast had misspelled Mrs. Foreman's name on her bill. I motioned to Mr. Nash and pointed to the spelling of Mrs. Foreman's name on the print-out from `pavoterservices.state.pa.us`. He raised his eyebrows and spoke again into the phone.

31. Within a minute, Mr. Nash finished his phone call. After he hung up, he said, "that name made a difference." I asked whether the person he had called could not find Mrs. Foreman's registration with the incorrect spelling of her name. He said yes.

32. Mr. Nash gave Mrs. Foreman a form titled "Request for Initial Issuance of PA Department of State ID for Voting Purposes." I am not certain if that was the exact title, but it is what I wrote in my notes after reading the form. Mrs. Foreman did not have glasses with her, and asked for my help reading the form. I read each section of the form to her, and she completed them.

33. After Mrs. Foreman had completed each section of the form, she gave it to Mr. Nash. We waited for several minutes, and then Mr. Nash gave us a new slip of paper. He told us to bring that paper to a second waiting area, so a photographer could take Mrs. Foreman's picture.

34. I continued to feel confused about the need for Mrs. Foreman's birth certificate, but, at that moment, I wanted her to get an identification card more than I wanted clarification, so I did not ask Mr. Nash why he hadn't requested a birth certificate like the first two clerks who served Mrs. Foreman.

35. At approximately 1:25 p.m., Mrs. Foreman left the PennDOT office with an identification card.

36. After I said goodbye to Mrs. Foreman on September 18, I went back to my office, which is also located in downtown Pittsburgh.

37. I continued to be curious about the birth certificate-related requirements of Pennsylvania's new voter identification law, so, when I returned to my office, I researched the requirements online. I learned that a birth certificate is not necessary to obtain a Department of State voter identification card, which clarified for me how Mrs. Foreman was able to do so, eventually.

September 19, 2012

38. The next morning, on September 19, 2012, I discussed the requirements of the law with my colleague, Nancy Spencer.

39. During our discussion, Ms. Spencer showed me a document she had printed from the website of the Pennsylvania Department of Transportation.

40. The document was titled "FAQ - Department of State Identification Card," and it was formatted exactly like the documents contained in the Guide that Mrs. Foreman and I read at PennDOT the day before. This document is attached as Exhibit 3 to this Declaration. I had never seen that document before Ms. Spencer showed it to me.

41. I decided to check and see if PennDOT was making the “FAQ – Department of State Identification Card” readily available to customers.

42. At approximately 2 p.m. on September 19, I walked to the PennDOT location at 708 Smithfield Street, where Mrs. Foreman had received her identification card the day before.

43. I looked in all of the plastic containers that held the forms and informational documents in the waiting area, including the two containers that were labeled “voter information.”

44. I took a copy of each of the documents in the containers labeled “voter information.” As they had the day before, the containers held only the “Guide”—which stated that an individual needed a Social Security Card and a certificate of citizenship, a certificate of naturalization, or a birth certificate with a raised seal in order to receive a photo identification for voting—and the “Affirmation.”

45. The “FAQ – Department of State Identification Card” was not in any of the containers in the PennDOT waiting room.

September 20, 2012

46. At approximately 3:30 p.m. on September 20, 2012, I walked to the same PennDOT location at 708 Smithfield Street.

47. I looked in all of the plastic containers that held the forms and informational documents in the waiting area, including the two containers that were labeled “voter information.”

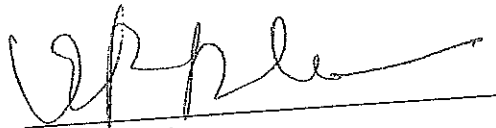
48. Again, the containers held the “Guide” and the “Affirmation.”

49. The “FAQ – Department of State Identification Card” was not in any of the containers in the PennDOT waiting room.

* *

50. I declare that the facts set forth above are true and correct to the best of my knowledge, information and belief and are made subject to the penalties of 18 P.S. § 4904 relating to unsworn falsification to authorities.

Dated: 21 SEPTEMBER 2012



Emma Rebhorn

EMMA REBHORN

Emma Rebhorn

EXHIBIT 1



pennsylvania
DEPARTMENT OF STATE

PENNSYLVANIA'S VOTER ID LAW

A Guide to ACT 18 of 2012

**Governor Tom
Corbett**

**Carol Secretary
Aichele**



pennsylvania
DEPARTMENT OF STATE

Tom Corbett, Governor

Carol Aichele, Secretary of the Commonwealth

PENNSYLVANIA'S VOTER ID LAW

FAQ – GENERAL INFORMATION ON VOTING IN PERSON:

What are the changes to the law and when do they go into effect?	<ul style="list-style-type: none">➤ Starting with the November 2012 General Election, Pennsylvania law now requires voters to show an acceptable photo ID to vote at the polls.
What is an acceptable form of ID?	<ul style="list-style-type: none">➤ All IDs must contain a NAME, a PHOTO, and an EXPIRATION DATE that is CURRENT, unless noted otherwise. Acceptable IDs include:<ul style="list-style-type: none">• Photo IDs issued by the U.S. Government or the Commonwealth of Pennsylvania, including:<ul style="list-style-type: none">◦ Pennsylvania driver's license or PennDOT photo ID card (valid for voting 12 months past expiration date)◦ U.S. passport◦ U.S. military ID (active duty and retired military IDs may designate an expiration date that is indefinite). Military dependents' IDs must contain a current expiration date.• Employee photo identification issued by Federal, Pennsylvania, Pennsylvania County, or Pennsylvania Municipal government• Photo identification issued by an accredited Pennsylvania public or private institution of higher learning• Photo identification issued by a Pennsylvania care facility, including long-term care facilities, assisted living residences and personal care homes➤ In the case of a voter who has a RELIGIOUS OBJECTION to being photographed, acceptable IDs include the following:<ul style="list-style-type: none">• Pennsylvania valid without-photo driver's license• PennDOT valid without-photo identification card
What if a voter does not have an acceptable form of ID?	<ul style="list-style-type: none">➤ A person who is registered to vote, but does not have an acceptable form of ID, may obtain a FREE PENNDOT PHOTO ID for voting purposes at a PennDOT Driver's License Center.



pennsylvania
DEPARTMENT OF STATE

Tom Corbett, Governor

Carol Alchele, Secretary of the Commonwealth

PENNSYLVANIA'S VOTER ID LAW

How does a voter
obtain a FREE
PENNDOT PHOTO ID
for voting?

- For a registered voter who PREVIOUSLY HAD a Pennsylvania driver's license or a PennDOT photo identification card that has been expired for one year or longer:
 - Visit a PennDOT Driver's License Center with a completed Application for Initial Photo Identification Card (Form DL-54A) – there is no need to bring any supporting documentation since identity and residency were previously validated by PennDOT. The voter should provide his or her current address on the application.
 - Obtain and sign an affirmation form, affirming that the voter does not have another acceptable form of ID for voting purposes. The form is available on PennDOT's website or at a PennDOT Driver's License Center.
 - A voter who still has his or her expired Pennsylvania driver's license or PennDOT photo identification card should bring it along to the Driver's License Center. However, if the voter no longer has it, PennDOT will be able to determine if the voter has an expired product.
 - If a voter has a Pennsylvania driver's license or PennDOT photo identification card that expired PRIOR TO 1990, the voter should call PennDOT's CUSTOMER CALL CENTER at 1-800-932-4600 to verify whether his or her record is still in PennDOT's system.
- For a registered voter who has NEVER HAD a Pennsylvania driver's license or a PennDOT photo identification card:
 - Visit a PennDOT Driver's License Center with a completed Application for Initial Photo Identification Card (Form DL-54A) and the following:
 - ✓ Social Security Card AND one of the following:
 - Certificate of U.S. Citizenship
 - Certificate of Naturalization
 - Birth Certificate with a raised seal
 - PLUS
 - ✓ Two proofs of *residency, such as lease agreements, current utility bills, mortgage documents, W-2 form, tax records

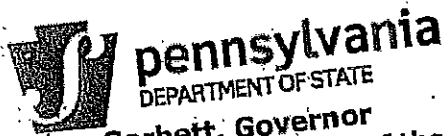


pennsylvania
DEPARTMENT OF STATE

Tom Corbett, Governor
Carol Aichele, Secretary of the Commonwealth

PENNSYLVANIA'S VOTER ID LAW

	<p>*Students at least 18 years of age: Accepted proofs of residency include the room assignment paperwork (considered a lease) and one bill with their dorm room address on it. Bank statements, paystubs and credit card bills are all acceptable.</p> <p>*Other Individuals who may not have any bills, leases or mortgage documents in their name may bring the person with whom they are living along with that person's driver's license or photo ID to a Driver's License Center as one proof of residence plus at least one more piece of official mail with their name and address.</p> <p>*Homeless individuals can use the address of a shelter as their residence provided they visit a Driver's License Center with an employee from the shelter that has an employee photo identification issued by the shelter and a letter on the shelter's letterhead indicating that the homeless individual stays at the shelter.</p> <ul style="list-style-type: none">Obtain and sign an affirmation form, affirming that the voter does not have another acceptable form of ID for voting purposes. The form is available on PennDOT's website or at a Driver's License Center. <p>➤ VISIT PennDOT's WEBSITE FOR MORE INFORMATION.</p>
How does a voter who has a religious objection to being photographed obtain a Pennsylvania valid without-photo driver's license or PennDOT valid without-photo identification card?	<ul style="list-style-type: none">➤ A voter who has a religious objection to being photographed should visit a PennDOT Driver's License Center or call PennDOT's Customer Call Center at 1-800-932-4600 to request an AFFIDAVIT IN SUPPORT OF EXEMPTION FOR SINCERELY HELD RELIGIOUS BELIEFS.➤ The voter should complete the Affidavit and mail it to the address included with the instructions. PennDOT will then make contact with the voter.
What if a voter born in Pennsylvania does not have a certified copy of his or her birth certificate?	<p>For a Pennsylvania-born registered voter, who does not already have a certified copy of his or her birth certificate and needs a photo ID for voting purposes PennDOT will forward requests for birth record certification to the Department of Health. This certification process will take approximately ten days and is FREE OF CHARGE.</p> <p>When visiting the PennDOT driver license center, a person</p>



Tom Corbett, Governor

Carol Aichele, Secretary of the Commonwealth

PENNSYLVANIA'S VOTER ID LAW

must:

- Tell the PennDOT customer service representative he or she was born in Pennsylvania and needs a photo ID for voting purposes, and does not have a certified copy of his or her birth certificate.
- Sign an affirmation that the registered voter does not have an acceptable form of ID for voting purposes and the photo ID is needed for voting purposes.
- Show a Social Security card and two proofs of residence, such as a deed, lease, tax bill, or utility bill.
- Fill out a DL-54A form requesting a non-driver photo ID.
- Complete the HD01564F (Request for Certification of Birth Record for Voter ID Purposes Only) form, which collects information such as birth name, mother and father's name, and place of birth.
 - If the Department of Health can certify the voter's birth record, the voter will receive a letter in the mail from PennDOT which the voter can bring, along with the documents detailed above, to a Driver's License Center IN PLACE OF a birth certificate with a raised seal.
 - If the Department of Health cannot certify the voter's birth record, the voter will receive a letter in the mail from PennDOT asking them to contact the Bureau of Vital Records at the Department of Health.

However, as noted above, a registered voter who previously had a Pennsylvania driver's license or a PennDOT photo identification card that has been expired for one year or longer may not need supporting documentation, such as a birth certificate, because identity and residency were previously validated by PennDOT

- If a voter has questions regarding PennDOT's identification verification process, the voter should call PennDOT's Customer Call Center at 1-800-932-4600.

What if a voter shows up at the polling place without an acceptable

- The voter will be able to vote by provisional ballot. However, in order for the ballot to count, a voter must, within six days after the election, provide the county



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Tom Corbett, Governor

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PENNSYLVANIA'S VOTER ID LAW

ID?	board of elections with a copy of an acceptable ID and an affirmation that the voter is the same person who cast the provisional ballot. These documents may be mailed, faxed, sent electronically (email), or brought into the county election office.
What if a voter cannot afford to obtain acceptable ID? Can they still vote?	<ul style="list-style-type: none">➤ If a voter cannot obtain an acceptable form of ID due to indigency, including an inability to pay for a certified birth certificate to get a Free ID, the voter will still be able to vote by provisional ballot.➤ However, in order for the ballot to count, the voter must, within six days after the election, provide the county board of elections with an affirmation that states that the voter is the same person who cast the provisional ballot, and that the voter is indigent and therefore unable to obtain proof of identification without the payment of a fee.

FAQ – GENERAL INFORMATION ON VOTING BY ABSENTEE BALLOT:

What are the changes to the absentee voting law and when do they go into effect?	➤ Starting with November 2012 General Election, Pennsylvania law now requires voters to provide proof of identification with an Application for Absentee Ballot.
Is anyone exempt?	➤ A qualified absentee voter is not required to provide proof of identification if the voter is entitled to vote by absentee ballot under the Uniformed and Overseas Citizens Absentee Voting Act (UOCAVA) or by alternative ballot under the Voting Accessibility for the Elderly and Handicapped Act.
What is proof of identification for a qualified absentee voter?	<ul style="list-style-type: none">➤ For a voter who has a current and valid Pennsylvania driver's license or PennDOT photo ID card, the voter must provide the driver's license number or photo ID number on the Application for Absentee Ballot.➤ For a voter who does not have a Pennsylvania driver's license or PennDOT photo ID card, the voter must provide the last four digits of his or her Social Security Number on the Application for Absentee Ballot.➤ For a voter who has a RELIGIOUS OBJECTION to being photographed, the voter must provide the Pennsylvania valid without-photo driver's license number or PennDOT valid without-photo identification number on the Application for Absentee Ballot, OR the voter must provide a copy of either of these documents with the Application



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Tom Corbett, Governor

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PENNSYLVANIA'S VOTER ID LAW

<p>What if a voter does not have a Pennsylvania driver's license or Social Security Number?</p>	<p>for Absentee Ballot.</p> <ul style="list-style-type: none">➤ A voter without either must provide with his or her Application for Absentee Ballot a copy of an ID that shows a NAME, a PHOTO, and an EXPIRATION DATE that is CURRENT, unless noted otherwise, such as:<ul style="list-style-type: none">• Photo IDs issued by the U.S. Government or the Commonwealth of Pennsylvania, including:<ul style="list-style-type: none">◦ U.S. passport◦ U.S. military ID (active duty and retired military ID may designate an expiration date that is indefinite). Military dependents' ID must contain a current expiration date• Employee photo identification issued by Federal, Pennsylvania, Pennsylvania County, or Pennsylvania Municipal government• Photo identification issued by an accredited Pennsylvania public or private institution of higher learning• Photo identification issued by a Pennsylvania care facility, including long-term care facilities, assisted living residences and personal care homes
<p>What does the county board of elections do with a voter's proof of identification?</p>	<ul style="list-style-type: none">➤ A county board of elections must verify the proof of identification before counting an absentee ballot. If the board is unable to do so, the board will contact the voter so he or she will be able to provide acceptable proof of identification.
<p>What if the voter does not include proof of identification with the Application for Absentee Ballot?</p>	<ul style="list-style-type: none">➤ A voter who does not include proof of identification on or with the Application for Absentee Ballot will still receive an absentee ballot; however, the county board of elections will send a notice to the voter with the absentee ballot requiring the voter to provide proof of identification or the ballot will not be counted.➤ A voter should provide the proof of identification as soon as possible so that the county board of elections can verify the information and the ballot can be counted.➤ If the county board of elections has not received the proof of identification that can be verified by the sixth day after the election, the voter's absentee ballot will not be counted.



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PENNSYLVANIA'S VOTER ID LAW

Is proof of
identification
information public?

➤ Proof of Identification on or provided with the Application
for Absentee Ballot cannot be made public.

**For more information on Pennsylvania's Voter ID Law,
visit www.VotesPA.com or call 1-877-VotesPA (1-877-
868-3772)**

EXHIBIT 2

**AFFIRMATION THAT VOTER DOES NOT POSSESS
PROOF OF IDENTIFICATION FOR VOTING PURPOSES**

By signing this form, I declare under oath or affirmation that I do not possess proof of identification as defined at section 102(z.5)(2) of the Pennsylvania Election Code (25 P.S. § 2602(z.5)(2)) and require proof of identification for voting purposes.

In particular, I affirm that I do not possess any of the following forms of identification:

- Identification issued by the United States Government that includes my name, a photograph, and an expiration date that is not expired.*
- Identification issued by the Commonwealth of Pennsylvania that includes my name, a photograph, and an expiration date that is not expired (unless issued by the Department of Transportation, then the expiration of the identification cannot be more than 12 months past the expiration date).
- Identification issued by a municipality of this Commonwealth to an employee of that municipality that includes my name, a photograph, and an expiration date that is not expired.
- Identification issued by an accredited Pennsylvania public or private institution of higher learning that includes my name, a photograph, and an expiration date that is not expired.
- Identification issued by a Pennsylvania care facility that includes my name, a photograph, and an expiration date that is not expired.

*In the case of a document from an agency of the armed forces of the United States or their reserve components, including the Pennsylvania National Guard, that establishes the voter as a current member or a veteran of the United States Armed Forces or National Guard and that does not designate a specific date on which the document expires, the document must include a notation indicating that the expiration is indefinite.

I affirm that I do not have any of the forms of identification listed above and require proof of identification for voting purposes, and that this affirmation is being made subject to the penalties of 18 Pa.C.S. § 4904 (unsworn falsification to authorities), which may include punishment of a fine of at least \$1,000, or to a term of imprisonment of not more than two years, or both.

Date of Signing

Signature of Voter

Printed Name of Voter

EXHIBIT 3



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DEPARTMENT OF STATE

Tom Corbett, Governor
Carol Aichele, Secretary of the Commonwealth

PENNSYLVANIA'S VOTER ID LAW

FAQ – DEPARTMENT OF STATE IDENTIFICATION CARD

What is a FREE DEPARTMENT OF STATE PHOTO ID CARD?	<ul style="list-style-type: none">➤ Beginning in the end of August, 2012, PennDOT will begin issuing FREE Department of State photo ID cards that registered voters can use to vote at the polls.
Who is eligible for a FREE DEPARTMENT OF STATE PHOTO ID CARD?	<ul style="list-style-type: none">➤ Only registered voters who do not have another photo ID acceptable for voting, who do not possess all of the documentation required to obtain the FREE PENNDOT PHOTO ID and cannot obtain the needed documentation, or cannot obtain the documentation without the payment of a fee will be eligible for a FREE Department of State photo ID card. Examples of missing documents include a certified copy of a birth certificate or Social Security card. All other eligible voters will be given a FREE PENNDOT PHOTO ID.
Where will a voter be able to receive a FREE DEPARTMENT OF STATE ID CARD?	<ul style="list-style-type: none">➤ Registered voters who cannot obtain the proper documentation needed for a FREE PENNDOT PHOTO ID card will be able to obtain a FREE DEPARTMENT OF STATE ID CARD at their local PennDOT Driver's License Center. PennDOT Driver's License Center locations can be found on the web at www.dot.state.pa.us or by phone through PennDOT's CUSTOMER CALL CENTER at 1-800-932-4600.
What is the process for obtaining a FREE DEPARTMENT OF STATE PHOTO ID for voting?	<ul style="list-style-type: none">➤ All registered voters seeking to obtain a FREE Department of State ID for voting purposes must first apply for a FREE PENNDOT PHOTO ID for voting.➤ When a PennDOT customer service representative determines that a registered voter does not have the necessary documentation to receive a FREE PENNDOT PHOTO ID, the PennDOT employee will then begin the process of issuing a FREE DEPARTMENT OF STATE PHOTO ID for voting.➤ In order for a registered voter to obtain a FREE DEPARTMENT OF STATE ID for voting, a registered voter must complete an Oath/Affirmation form affirming they have no other acceptable identification and a <u>Request For Initial Issuance Of Pennsylvania Department Of State ID For Voting Purposes form</u>. <p>✓ Information requested will include:</p>



Tom Corbett, Governor

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PENNSYLVANIA'S VOTER ID LAW

- A name
- Address
- Social Security Number
- Proof(s) of residence
- County
- Previous name and/or address if changed within the past 12 months

✓ **Voters who have registered within the past 30 days** will be able to indicate that by marking a box on the form.

➤ After confirming the voter's Identity and voter registration with the Department of State, the registered voter will then be issued a FREE DEPARTMENT OF STATE PHOTO ID Card.

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

VIVIETTE APPLEWHITE, *et al.*,
Petitioners,

v.

THE COMMONWEALTH OF
PENNSYLVANIA, THOMAS CORBETT,
Governor, and CAROL AICHELE,
Secretary of the Commonwealth,
Respondents.

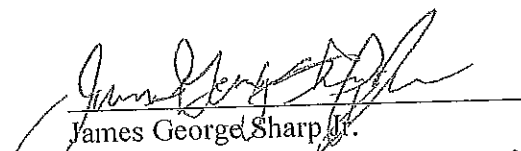
Case No. 330 MD 2012

DECLARATION OF JAMES GEORGE SHARP JR.

I, James George Sharp Jr., hereby declare as follows:

1. I am over the age of 18 and otherwise competent to testify.
2. I am a resident of Philadelphia in Philadelphia County, Pennsylvania.
3. I am registered to vote in Pennsylvania and otherwise meet the qualifications for voting, namely, I am over the age of 18, a U.S. citizen, and have lived in Pennsylvania for more than 30 days.
4. The statement contained in Exhibit 1, attached hereto, was freely made by me and is, to the best of my knowledge, information and belief, true and accurate.
5. I declare that the facts set forth above are true and correct to the best of my knowledge, information and belief and are made subject to the penalties of 18 P.S. § 4909 relating to unsworn falsification to authorities.

Dated: 9/21/20


James George Sharp Jr.

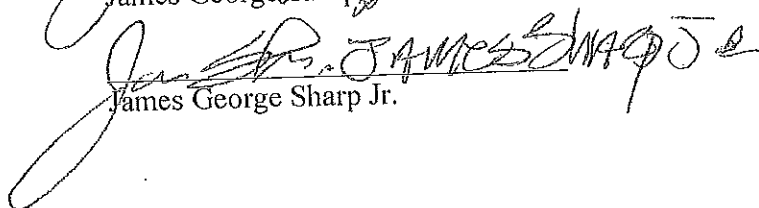

James George Sharp Jr.

Exhibit 1

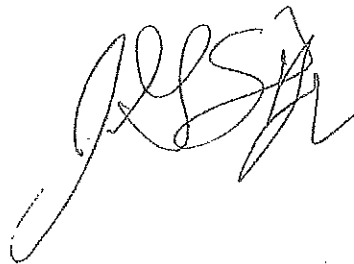
My name is James Sharp. I am 48 years old. Even though I have a photo ID from the Department of Veterans Affairs, because I spent 10 years in the military, I was told that this ID was not good enough to vote in this November's election. I finally got an ID from PennDOT so that I could vote in November, but only after two days of trying to do so.

I was born in New Jersey, but have lived in Pennsylvania since 2000. I recently spent time in prison in Pennsylvania, but I got out of prison in January 2011 and am not on probation or parole. I am registered to vote in Pennsylvania. I was working part-time for a moving company in late August, being paid hourly.

I heard about the new photo identification law when I registered to vote this summer at a table by the Allegheny Avenue stop on the El. Because I wanted to vote, I missed work on August 28, 2012, to try to get an ID. I brought my state prison ID, my Veterans' Affairs ID, my Social Security Card, two proofs of residence, and my DD214 (separation from military service) to the PennDOT at 8th and Arch. After waiting for most of the day, the PennDOT clerk finally called someone in Harrisburg at about 4:30 pm to try to confirm my voter registration. The clerk told me that, because the officials in Harrisburg had gone home for the day, they could not confirm my registration. I was furious, both at the long wait and the fact that I could not get an ID. The PennDOT supervisor told me that I would have "priority" if I came back to PennDOT another day. The supervisor also told me that I would be better off trying to get my birth certificate from New Jersey and getting the regular PennDOT photo ID, instead of the Department of State ID, even though I only wanted the ID to vote.

On August 30, I took public transportation to New Jersey to get a copy of my birth certificate. I paid \$6, taking the El, the PATCO train to New Jersey, and then the River Line train. When I got there, I paid \$30 for a copy of my birth certificate. I then took the River Line and PATCO train back to the PennDOT at 8th and Arch. I waited another six hours before I finally was able to get a Pennsylvania ID card that I can use to vote. While I was waiting, I saw other people that just gave up and left because of the long wait time.

I have been voting since I was 18 years old, and it is important to me that I vote in this November's election to make my voice heard. I was very frustrated that I had to take two days off of work, losing wages, and spend money to get my birth certificate, which was a hardship for me since I have a very limited income. I really could not afford to spend this money, but I did it because I want I to exercise my right to vote.

A handwritten signature in black ink, appearing to be 'JPSA', located in the bottom right corner of the page.

**IN THE COMMONWEALTH COURT
OF PENNSYLVANIA**

Viviette Applewhite; Wilola Shinholster Lee;
Grover Freeland; Gloria Cuttino; Nadine
Marsh; Dorothy Barksdale; Bea Bookler; Joyce
Block; Henrietta Kay Dickerson; Devra Mirel
("Asher") Schor; the League of Women Voters
of Pennsylvania, National Association for the
Advancement of Colored People, Pennsylvania
State Conference; Homeless Advocacy Project,

Petitioners,

v.

The Commonwealth of Pennsylvania; Thomas
W. Corbett, in his capacity as Governor; Carol
Aichele, in her capacity as Secretary of the
Commonwealth,

Respondents.

Docket No. 330 MD 12

DECLARATION OF CAROL J. SICURA

Comes now Carol J. Sicura and declares as follows:

1. My name is Carol J. Sicura. I live at 2531 South Darien Street, Philadelphia, Pennsylvania.
2. I am 90 years old and am competent to testify. I am registered to vote in Pennsylvania and otherwise meet the qualifications for voting, namely, I am over the age of 18, a U.S. citizen, and have lived in Pennsylvania for more than 30 days. I intend to vote in person in the election of November 6, 2012.

3. I previously had a Pennsylvania driver's license, but I am unable to drive and allowed my license to lapse in or about 2000. I rely on family members to drive me to appointments.
4. On September 17, 2012, my daughter drove me to a PennDOT driver's license center at Granite Run Mall located in Media, Pennsylvania so that I could obtain a photo ID for voting purposes.
5. I took a number when I arrived at the center and, after waiting approximately fifteen (15) minutes, once my number was called, a PennDOT employee at the center told me that I could not have my photograph taken there that day for an ID for voting purposes.
6. I observed other people getting their photographs taken at the center, and I asked the employee why they could get their photos taken but I could not. He told me that this center was taking photographs that day for people getting their driver's licenses renewed but not for people getting free photo IDs for voting purposes.
7. I also asked the employee for copies of any forms I would need to complete for a photo ID for voting purposes. He told me he had no idea what forms I would need to fill out, and he instructed me to call a main telephone number for the Pennsylvania Department of Transportation located in Harrisburg, Pennsylvania.
8. When we returned to my daughter's house, she went on the website for the Pennsylvania Department of Transportation, Driver & Vehicle Services and clicked on the Voter ID icon, which took her to a screen which said "Obtaining a Free PennDOT Secure ID for Voting Purposes." She searched for a location nearest to her house, which identified the center that we had just visited at Granite Run Mall and listed that center's hours of operation. The website did not specify that the facility does not take photographs for IDs for voting purposes on Mondays.


See printout of the facility information on the Pennsylvania Department of Transportation website, attached hereto as Exhibit 1.

9. As of today, I remain without photo identification that meets the requirements of Pennsylvania's new voter ID law.
10. My daughter has offered to take me to the PennDOT center a second time when she is available so that I can again attempt to obtain a photo ID for voting purposes.
11. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Further declarant says not.

Dated: Sept 21, 2012

Carol J. Sicura
Carol J. Sicura



pennsylvania
DEPARTMENT OF TRANSPORTATION

Driver & Vehicle Services

PA STATE AGENCIES ONLINE SERVICES

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Tom Corbett, Governor

Barry J. Schoch, P.E., Secretary, Department of Transportation

Online Driver and Vehicle Services

Information Centers

Business Partners

About this Site

Security on this Site

Home

Rate this Site

Search this Site

Locator Search Results

[New Search](#)

Search Selections

Location: 19014 Zip Code

Services: Photo ID Card

Important Information: Please read before visiting any PennDOT Driver or Photo License Center.

Facility	Site	Distance
PennDOT Photo & Exam Center	Media	4 Miles
PennDOT Photo & Exam Center	Island Avenue	11 Miles
PennDOT Photo & Exam Center	Frazer/Malvern	14 Miles
PennDOT Photo & Exam Center	Columbus Blvd.	15 Miles
PennDOT Photo & Exam Center	Arch Street	16 Miles
PennDOT Photo & Exam Center	Norristown	19 Miles
PennDOT Photo & Exam Center	West Oak Lane	19 Miles
PennDOT Photo & Exam Center	Lawndale	23 Miles
PennDOT Photo & Exam Center	Huntingdon Valley	27 Miles
PennDOT Photo & Exam Center	Bensalem	31 Miles

Media [Top ▲](#)

Type: PennDOT Photo & Exam Center

Facility: PennDOT Photo & Exam Center

Address: Granite Run Mall (Behind ACME)
1067 W. Baltimore Pike
Media, PA 19063

County: Delaware


Hours:	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	8:30am- 4:15pm *	8:30am- 4:15pm	8:30am- 4:15pm	8:30am- 6:00pm *	8:30am- 4:15pm	8:30am- 4:15pm
Driver License Center	Closed	8:30am- 4:15pm	8:30am- 4:15pm **	8:30am- 4:15pm **	8:30am- 4:15pm **	8:30am- 4:15pm **
Best Times To Visit	Closed	Continuous Flow	9:00am- 11:00am	9:00am- 11:00am	9:00am- 11:00am	Continuous Customer Flow

* Please note that the hours of operations at the Photo License Center are different than the Driver License Center. This is to provide photo service for individuals with a camera card who only need to have their picture taken. No other services are available when the Driver License Center is closed.

** Commercial Knowledge test only given until 2:00pm because of length of test.

Directions: State Route 352/Middletown Road toward US-1 to W. Baltimore Pike, adjacent to the Granite Run Mall. The Granite Run Driver License Center is located directly behind the ACME Grocery Store.

Miles Away: 4

Map:  Click on the MapQuest graphic to display a map for this location. The service center is represented by the red star at the center of the map.

[Contact Us](#)

VIVIETTE APPLEWHITE, *et al.*,
Petitioners,
v.

THE COMMONWEALTH OF
PENNSYLVANIA, THOMAS CORBETT,
Governor, and CAROL AICHELE,
Secretary of the Commonwealth,
Respondents.

Case No. 330 MD 2012

DECLARATION OF DOROTHY SONNTAG

I, Dorothy Sonntag, hereby declare as follows:

1. I am over the age of 18 and otherwise competent to testify.
2. I am a resident of Norristown, Pennsylvania.
3. I live at 330 Walnut St., Apt. 421, PA 19401.
4. I have a bad back and bad lungs and it is difficult for me to get around, but I am able to drive.
5. I have been registered to vote for many years, have always voted in person, and have never missed voting in a Presidential election. I will continue to vote in person as long as I can. I intend to vote in the upcoming election.
6. My polling location is not far from my home. I drive some of the residents from my building to the polling location because they are in wheelchairs or use walkers.
7. On August 20, 2012, I took my friend Milton Goldson to the Norristown PennDOT to get an ID for voting purposes. I also needed to renew my driver's license.
8. It is difficult to shuttle Milton around because it is hard on my body.

9. That day, we waited at least 2.5 hours to get Milton's ID. We had to walk between two buildings, which is extremely difficult for Milton.

10. I accompanied Milton through the entire process. We walked into the first building, waited in line for the check-in desk, and eventually got numbers. We waited approximately 1 hour before my number was called. When my number was called, I walked to the counter. I told her that I needed to get my license renewed and get Milton a photo ID for voting. She said that we had to go next door.

11. We went to the second building, waited in line, and got numbers. They called my number and I got my new license. The woman who took my picture told me I had to go next door for Milton's ID, but she also told me that I needed a \$13.50 money order for Milton's ID. I told her that we already went next door. She said we would have to go back and she also told me I could get a money order at Rite Aid.

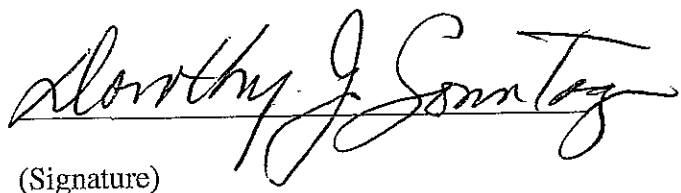
12. We drove down the street to get a \$13.50 money order at the Rite Aid on Route 202.

13. When I came back, a PennDOT employee came to talk to me and said that Milton's ID was ready next door.

14. The process was very complicated and confusing.

15. I declare that the facts set forth above are true and correct to the best of my knowledge, information and belief and are made subject to the penalties of 18 P.S. § 4904 relating to unsworn falsification to authorities.

Dated: September 23, 2012


(Signature)

DOROTHY J. SONNTAG

Dorothy Sonntag

**WESTERN
UNION**

**MONEY
ORDER**

THIS DOCUMENT CONTAINS A TRUE WATERMARK - HOLD UP TO LIGHT TO VIEW

WESTERN UNION FINANCIAL SERVICES INC. - ISSUER
Englewood, Colorado

Payable at Wells Fargo Bank Grand Junction - Downtown, N.A., Grand Junction, Colorado



(ISSUING AGENT)

A 239820 D 090612
T 1116 16
470132070932 L 00719

47-013207093

\$ 13.50

PAY EXACTLY

THIRTEEN DOLLARS AND 50 CENTS

PAY TO THE
ORDER OF

PAYMENT FOR/ACCT. #

PURCHASER'S ADDRESS

PURCHASER'S SIGNATURE

⑆102100400⑆ 404701320709320⑈

MONEY ORDER RECEIPT - NON NEGOTIABLE

ACT 239820 LOC 00719 Reg #2 DT 090612 \$13.50
THIRTEEN DOLLARS AND 50 CENTS

Payable to:
RETAIN THIS MONEY ORDER RECEIPT. IT MUST BE INCLUDED WITH ALL REFUND REQUESTS. BE SURE TO READ IMPORTANT
INFORMATION BELOW AND ON BACK.
PURCHASE AGREEMENT: You the purchaser agree that Western Union Financial Services Inc. (WUFSI) need not stop payment
on or replace, or refund a lost or stolen WUFSI Money Order unless (1) you fill in the face of the Money Order at the time of
purchase, and (2) you report the loss or theft to Western Union Financial Services Inc. in writing immediately, and (3) You provide
WUFSI with the original Money Order receipt issued by Western Union Financial Services Inc., Englewood, Colorado. For customer
service, call 1-800-959-9669.

* 4 7 0 1 3 2 0 7 0 9 3 *



LOAD THIS DIRECTION, THIS SIDE UP

LOAD THIS DIRECTION, THIS SIDE UP

SERVICE CHARGE
If this Money Order is not used or cashed (presented for payment) within one (1) year of the purchase date, there will be a non-refundable service charge applied (where permitted by law). The service charge will be deducted from the amount shown on the Money Order. The service charge is fifty cents (\$0.50) per month from the date of purchase, not to exceed forty-two dollars (\$42) (or where such charge exceeds the maximum amount permitted by law, the maximum amount permitted by law).

ENDORSE ABOVE THIS LINE

NOTICE Do not cash this Money Order for any person from whom you are not able to recover your payment. Should this item bear any unauthorized signature, be stolen, improperly completed, or altered, issuer will either stop payment hereon or charge back against any endorsement. For customer service, call 1-800-999-9660. Intended for domestic use only. Western Union Money Order and Design is a service mark of Western Union Holdings, Inc. Warning - do not cash check without noting true watermark. Hold up to light to verify presence of watermark.

For your financial service needs, visit our website at
www.westernunion.com

Western Union Financial Services, Inc. Money Order Tracing/Refund Request
This request is to be completed by the purchaser only. Stop payment is not required to be made at the time of purchase. The request must be completed and returned to the purchaser. If the original of the Money Order receipt is not enclosed, your request will be delayed and may be denied. Enclose a \$15.00 non-refundable processing fee for each photocopy or refund request. A photocopy will not be processed until the \$15.00 is received. **NOTICE:** At its discretion Western Union Financial Services, Inc. may deduct the fee from your refund if it is not enclosed with your request. All requests for refunds and photocopies must be in writing. Please allow 30 days for processing.

For customer service,
call 1-800-999-9660.

Purchaser's Name First		Last (Please Print)	
Mailing Address (Please Print)			
City			
State ZIP Code			
SEND REQUEST TO: Western Union Financial Services, Inc. PO Box 7030 Englewood, CO 80155-7030			
Money Order was purchased at			
Reason for Request			
DATE PURCHASED			
AMOUNT			
Money Order was purchased at			
(Name & address)			
DATE			
PHONE NUMBER			

Notice: Western Union Financial Services, Inc. (WUFSI) is refund to me the face amount of the above Money Order, and in consideration of that payment, I authorize WUFSI to stop payment on the Money Order, to refuse to cash or cash the Money Order, and to hold WUFSI harmless against any and all expense and/or liability to which it may be subject by reason of this refund to me, by reason of my alleged loss of the Money Order.

PURCHASER SIGN HERE (IN INK) X BEFORE MAILING, BE SURE THAT THIS FORM HAS BEEN SIGNED IN INK.

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

VIVIETTE APPLEWHITE, *et al.*,
Petitioners,

v.

THE COMMONWEALTH OF
PENNSYLVANIA, THOMAS CORBETT,
Governor, and CAROL AICHELE,
Secretary of the Commonwealth,
Respondents.

Case No. 330 MD 2012

DECLARATION OF (NAME)

I, Erik Stillabower, hereby declare as follows:

1. I am over the age of 18 and otherwise competent to testify.
2. I am a resident of Pittsburgh, Allegheny County, Pennsylvania.
3. I ^{have} ~~am~~ registered to vote in Pennsylvania and otherwise meet the qualifications for voting, namely, I am over the age of 18, a U.S. citizen, and have lived in Pennsylvania for more than 30 days.
4. The statement contained in Exhibit 1, attached hereto, was freely made by me and is, to the best of my knowledge, information and belief, true and accurate.
5. I declare that the facts set forth above are true and correct to the best of my knowledge, information and belief and are made subject to the penalties of 18 P.S. § 4904 relating to unsworn falsification to authorities.

Dated: 9/21/12

Erik Stillbaker
(signature)

Erik Stillbaker
(printed name)

Exhibit 1 to Declaration of Erik Stillabower
Statement of Erik Stillabower

Page 1 of 2

My name is Erik Stillabower. I moved to Pittsburgh last year from Indiana and registered to vote here in Pittsburgh in August. However, when I went to PennDOT recently to get an ID, I was unable to do so because I was apparently not in the registration system.

I initially registered to vote at my current address around 2 August 2012. Two weeks later, around 16 August, I received a letter in the mail stating that my information on the registration form was incorrect. My last name on the letter was spelled incorrectly as Stillzbower, which I believe caused the error. The letter included a corrections sheet which I returned with the correct information more clearly written. I never received anything in the mail after returning the letter such as a voter registration card.

On September 18th, 2012, I entered the Smithfield DMV in downtown Pittsburgh around 11 and walked up to the counter to receive a number for waiting. I told the woman behind the counter I was there to receive a free voter photo ID. The security guard asked why Christina, my live-in girlfriend, was there. Christina said that it was in case she needed to co-sign an affidavit proving residency.

I waited about 45 minutes in line before my number was called. When my number was called, I brought 3 bank statements and 1 electric bill. Christina was also present as a proof of residency or to co-sign an affidavit. After looking through my statements, the DMV worker said that he needed more proof that I am who I say I am, because the mail proved that an Erik Stillabower lived at the address, not that I am Erik Stillabower. He requested a birth certificate, social security card, or driver's license. I responded by asking for the affidavit for the voter ID, and he had no idea what I was talking about. He said that for any ID, you need something that proves you are who you are, such as the three items listed above. We had a brief conversation where I further requested the affidavit affirming my identity for the free voter ID where Christina could co-sign. I explained that I had lost both my birth certificate and social security card during my move last year from Indiana, where I was born and that I didn't have a driver's license or state ID. The worker then made a phone call, and after a brief conversation over the phone, he said that he would provide me with the affidavit. I then filled out all the paper for the ID, such as my name and address; except for the affidavit, which I never saw. After filling out the paperwork, he made another call to make sure I was registered to vote, and after being on hold for 7 minutes, he told me that he was informed I was not registered. He gave me the number for the state agency, which I believe to be the board of elections. He said that I was not able to get the voter ID unless I was registered to vote and that there was nothing more I could do at that time. I left the DMV and immediately re-registered to vote at approximately 12:30.

After leaving PennDOT I re-registered with an organization that provided vote registration cards, one Pittsburgh

Exhibit 1 to Declaration of Erik Stillabower
Statement of Erik Stillabower
Page 2 of 2

I work as a prep cook and Tuesday is my only day off when PennDOT is open. Other days of the week, I work both lunch and dinner shifts with a break from 3:00pm to 4:30pm. I really want an ID to vote in November but because of my schedule, I am waiting to get my registration card before returning to the DMV for another attempt.

ON 9/21/12 I checked the PA Dept. of State Voter Registration status Data base online and I was still not registered to vote. *ES*

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

VIVIETTE APPLEWHITE, *et al.*,
Petitioners,

v.

THE COMMONWEALTH OF
PENNSYLVANIA, THOMAS CORBETT,
Governor, and CAROL AICHELE,
Secretary of the Commonwealth,
Respondents.

Case No. 330 MD 2012

DECLARATION OF (NAME)

I, Martha Sudler, hereby declare as follows:

1. I am over the age of 18 and otherwise competent to testify.
2. I am a resident of Darby in Delaware County, Pennsylvania.
3. I am registered to vote in Pennsylvania and otherwise meet the qualifications for voting, namely, I am over the age of 18, a U.S. citizen, and have lived in Pennsylvania for more than 30 days.
4. The statement contained in Exhibit 1, attached hereto, was freely made by me and is, to the best of my knowledge, information and belief, true and accurate.
5. I declare that the facts set forth above are true and correct to the best of my knowledge, information and belief and are made subject to the penalties of 18 P.S. § 4909 relating to unsworn falsification to authorities.

Dated: 9-21-12

Martha Sudler
(signature)

Martha Sudler
(printed name)

Exhibit 1 to Declaration of Martha Sudler

Statement of Martha Sudler

My name is Martha Sudler. I was born in Philadelphia at Philadelphia General Hospital in 1950. I have voted in Pennsylvania for many years and when I read in the newspaper that I would need an ID to vote this year, and that free IDs for voting would be available at PennDOT, I went to get one. After a very long wait, I was told that I would need to wait two weeks for the state to attempt to verify my birth and then make another trip to PennDOT to get an ID.

On Wednesday, August 28th, 2012, I walked approximately one mile to the Island Avenue PennDOT in Philadelphia. I arrived at approximately 10:00 a.m. and brought with me a copy of my social security card, a letter from the social security office with my address on it, and a copy of my birth certificate. I do not have the original.

The waiting room was completely full and I waited in line for over four hours before being helped. I showed the PennDOT employee the documents I had brought and was instructed to fill out a form that PennDOT would send to Harrisburg to try to verify my birth in Pennsylvania. I returned the form to the PennDOT official and was instructed to wait for a return letter by mail in approximately ten days. I was told that if they could verify my birth, I could obtain a PennDOT photo ID. It was almost 3:00 p.m. when I left the PennDOT office. *They did not offer me the opportunity to get a permanent state ID at this time. M.S.* During the first week of September, I received a letter back from Harrisburg stating that they were unable to find my birth certificate but that I could return to PennDOT with this letter to seek a Department of State ID for voting. I was not able to return to PennDOT immediately because I take care of my grandchildren most days while my daughter is at work.

On September 20th, I walked back to the Island Avenue PennDOT with the letter. After waiting for approximately thirty minutes, I finally was able to get a Department of State idea to vote this November.

M.S.

**IN THE COMMONWEALTH COURT
OF PENNSYLVANIA**

Viviette Applewhite; Wilola Shinholster Lee;
Grover Freeland; Gloria Cuttino; Nadine
Marsh; Dorothy Barksdale; Bea Bookler; Joyce
Block; Henrietta Kay Dickerson; Devra Mirel
("Asher") Schor; the League of Women Voters
of Pennsylvania, National Association for the
Advancement of Colored People, Pennsylvania
State Conference; Homeless Advocacy Project,

Petitioners,

v.

The Commonwealth of Pennsylvania; Thomas
W. Corbett, in his capacity as Governor; Carol
Aichele, in her capacity as Secretary of the
Commonwealth,

Respondents.

Docket No. 330 MD 12

DECLARATION OF REGINA TRICE

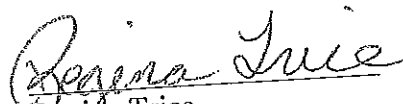
Comes now Regina Trice and declares as follows:

1. My name is Regina Trice. I live in Philadelphia, Pennsylvania.
2. I am 45 years old. I am competent to testify. I am registered to vote in Pennsylvania and otherwise meet the qualifications for voting, namely, I am over the age of 18, a U.S. citizen, and have lived in Pennsylvania for more than 30 days. I intend to vote in person in the election of November 6, 2012.
3. I do not have any form of photo identification that meets the requirements of Pennsylvania's new voter ID law.

4. I do not own or rent any sort of home. I am currently spending nights at the home of a friend, who is seriously ill. I am registered to vote at my friend's address.
5. I used to work in a tire shop, but I have been unemployed for approximately three months. Every week day I eat at a soup kitchen in Philadelphia. I do not have a telephone.
6. In early September, 2012, I went to the PennDOT center at 8th Street and Arch Street in Philadelphia to get a photo ID for voting purposes.
7. I do not pay any utility bills, do not have a lease or mortgage, and have never received mail at the friend's house where I am staying.
8. I was born in Delaware. I do not have a copy of my birth certificate.
9. I know my Social Security Number, but I do not have a Social Security card.
10. At the PennDOT center, a PennDOT employee told me that I could not get a photo ID, because I did not have the necessary documents.
11. The PennDOT employee did not tell me about the Department of State photo ID option.
12. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Further declarant says not.

Dated: 9-20-12


Regina Trice

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

VIVIETTE APPLEWHITE, *et al.*,
Petitioners,

v.

THE COMMONWEALTH OF
PENNSYLVANIA, THOMAS CORBETT,
Governor, and CAROL AICHELE,
Secretary of the Commonwealth,
Respondents.

Case No. 330 MD 2012

DECLARATION OF SUZANNE WILLIAMSON

I, Suzanne Williamson, hereby declare as follows:

1. I am over the age of 18 and otherwise competent to testify.
2. I am a resident of Philadelphia, PA.
3. Both my sister, Mattie Lee Williams, and I are registered to vote in Pennsylvania and otherwise meet the qualifications for voting, namely, we are over the age of 18, are U.S. citizens, and have lived in Pennsylvania for more than 30 days.
4. The statement attached hereto was freely made by me and is, to the best of my knowledge, information and belief, true and accurate.
5. I declare that the facts set forth above are true and correct to the best of my knowledge, information, and belief and are made subject to the penalties of 18 P.S. § 4904 relating to unsworn falsification to authorities.

Dated: 9/23/12 Suzanne Williamson
Suzanne Williamson
Suzanne Williamson
Suzanne Williamson

Statement for Suzanne Williamson

My name is Suzanne Williamson. I am 61 years old. I live with my sister, Mattie Lee Williams, who is 52 years old, at 1321 East Cardeza Street in Philadelphia. Mattie is autistic. Voting is very important to Mattie, so when I heard about the new voter ID law, I knew that I had to get Mattie an ID to vote. I finally got her a Department of State ID, but only after two trips to PennDOT and two trips to the Department of Vital Records downtown.

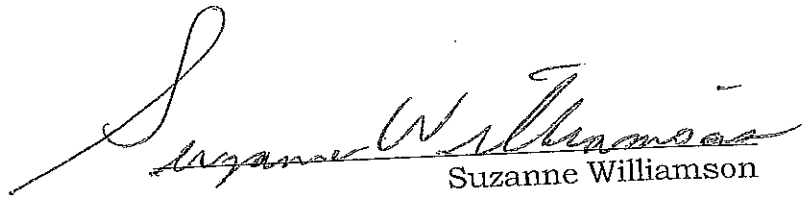
After I heard about the new law, Mattie and I went to the PennDOT on Ogontz Avenue in Philadelphia to try to get her an ID to vote. This was around late August. I brought Mattie's birth certificate, Mattie's Social Security Card, and several pieces of mail with Mattie's name and address on it to the PennDOT. All of these documents are attached as Exhibits to this Statement.

The PennDOT clerk would not give Mattie an ID, because they said that her birth certificate—even though it is a "Record of Birth" with a gold raised seal from Albert Einstein Medical Center in Philadelphia—was not an acceptable birth certificate because it came from the hospital and not from the State. The clerk told me that I could obtain Mattie's state-issued birth certificate from the Department of Vital Records at 801 Arch Street, downtown.

So I took public transportation downtown to try and get Mattie's birth certificate. It takes a long time for me to get downtown. When I finally got to Vital Records, I waited about a half hour, but I had to leave to get back to meet Mattie at our house, who was coming home from a workshop. Two days later, I went back to Vital Records at 801 Arch Street. The clerk told me that I couldn't get a copy of Mattie's birth certificate unless I brought a copy of my own birth certificate, which I didn't have with me. At this point, I thought: "Are you kidding?" I realized that I need some help if Mattie was going to vote in this November's election.

So I went to the office of the Pennsylvania Voter ID Coalition and asked for help. An advocate went back with me to the PennDOT on Ogontz Avenue on Saturday, September 15. I brought all of the same documents that I had brought the first time to the PennDOT. This time, I was able to get Mattie a Department of State ID to vote in November.

Mattie has always voted with either me or our mother. Voting is very important to Mattie, especially because there are so many things in life that she cannot do. Mattie always asks me: "When are we going to vote?" It would have been so easy for us to give up after all we went through to get Mattie's ID, but we were determined to get her an ID so that she can vote.



Suzanne Williamson

BIRTH

Application for Certified Copy of Birth Record

Pennsylvania Department of Health ♦ Division of Vital Records

BIRTH

PART 1: By my signature below, I state I am the person whom I represent myself to be herein, and I affirm the information within this form is complete and accurate and made subject to the penalties of 18 Pa.C.S. §4904 relating to unsworn falsification to authorities. In addition, I acknowledge that misstating my identity or assuming the identity of another person may subject me to misdemeanor or felony criminal penalties for identity theft pursuant to 18 Pa.C.S. §4120 or other sections of the Pennsylvania Crimes Code. (Note: Signature must agree with name listed in Parts 2 and 5 of this form.)

Signature of person making request (Do not print): Mattie L. Williams
 Signature required on ALL requests. Must be 18 years of age or older to apply. If under 18, immediate family member must request record.

PART 2: PRINT or TYPE name of individual requesting record and his/her current mailing address.

Name: Mattie L. Williams Relationship to Person Named on Record: _____
 Address: 1321 CanDeza Street State: PA Zip: 19119
 City: Philadelphia E-mail Address: None
 Daytime phone number: (215) 5493841 ☐ Social Security/Benefits ☐ School

Intended Use of Certified Copy: ☐ Travel (Date needed: _____)
☐ Employment ☐ Driver's License ☒ Other (List reason: to vote) Number of copies: 1

PART 3: PRINT or TYPE information below regarding person named on requested record:

Name at Birth: Mattie Lee Williams
 If name has changed since birth due to adoption, court order, or any reason other than marriage, please list that name here: _____
 Date of Birth: 4/26/1960 Age Now: 51 Sex: ☐ Male ☒ Female
 (Month/Day/Year - Records available from 1906 to the present)
 Place of Birth: Philadelphia PA Hospital: ALBERT EINSTEIN MEDICAL CENTER
 (City/Boro/Twp. in Pennsylvania)
 Full Maiden Name of Mother: MORRISON - MARY ANN L. MORRISON

Full Name of Father: THOMAS C. WILLIAMS

PART 4: BIRTH: \$10.00 each. If fee is required, make check/money order payable to: VITAL RECORDS.
 Fees will be waived for individuals and their dependents who served or are currently serving in the Armed Forces (complete the following):
 Armed Forces Member's Name: _____ Service Number: _____
 Relationship to Armed Forces Member: _____ Rank and Branch of Service: _____

PART 5: VALID GOVERNMENT ISSUED PHOTO ID REQUIRED
 Individual requesting record must send a legible copy of his/her valid government issued photo ID that verifies name and mailing address as listed in Part 2 above.

- Examples: State issued driver's license or non-driver photo ID (if address has been changed, include copy of update card).
- If possible, enlarge photo ID on copier by at least 150% (copies of ID will be shredded upon review).
- If acceptable ID is not available, visit our website at www.health.state.pa.us/vitalrecords for further information.

Mail with self-addressed, stamped envelope to:

Division of Vital Records
 ATTN: Birth Unit
 PO Box 1528
 New Castle, PA 16103

Print or type name and address in the space provided below
 (must agree with name and address on ID documentation):

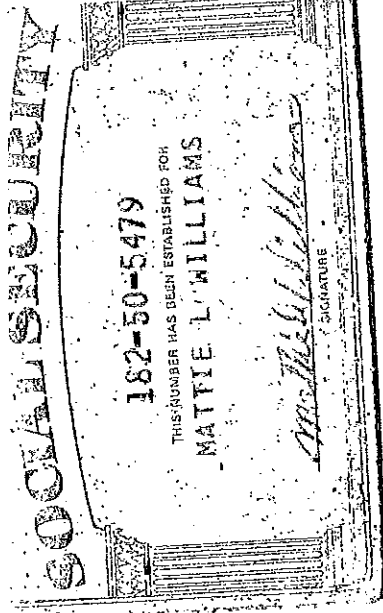
Name
Street
City, State, Zip Code

Have you?

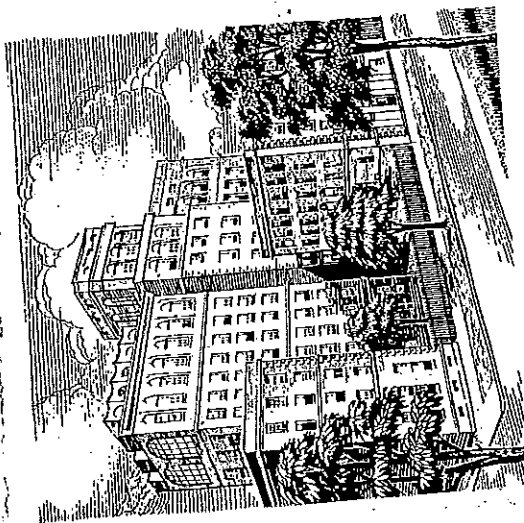
- ☒ Signed your name in Part 1 (do not print)
- ☒ Listed your name and current mailing address in Parts 2 and 5
- ☒ Completed all items in Part 3 (enter unknown if information unavailable)
- ☒ Enclosed payment (or completed Part 4 for waiver of fee)
- ☒ Enclosed legible copy of ID (must agree with your name and address in Parts 2 and 5)

You are welcome to visit one of our public offices listed on the reverse side of this form

For more information, visit our website: www.health.state.pa.us/vitalrecords



ALBERT EINSTEIN MEDICAL CENTER
SOUTHERN DIVISION
PHILADELPHIA, PENNSYLVANIA



Record of Birth

This Certifies that Wattie Lee Williams
was born to Thomas & Mary Williams
in this Hospital at 3:50 o'clock, A.M. on Tuesday 1960
the 26th day of April



In Witness Whereof the said Hospital has caused this Certificate to
be signed by its duly authorized officer, and its Official Seal to be
hereunto affixed

David A. Johnson, MD
ATTENDING PHYSICIAN

E. C. CUSTANTINE
ADMINISTRATOR

IMPORTANT SOCIAL SECURITY INFORMATION



www.socialsecurity.gov

GPO: U.S. GOVERNMENT PRINTING OFFICE : 2011-365-897

CU1900546-1C411981174

Printed on recycled paper Form SSA-4926-SM-DI (1-2012)

SUZANNE WILLIAMSON FOR
MATTHE L WILLIAMS
1321 E CARDEZA STREET
PHILADELPHIA PA 19119-1546

FIRST-CLASS MAIL
PRESORTED
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SOCIAL SECURITY
ADMINISTRATION
PERMIT NO. G-11

be sure to check out
our website: www.socialsecurity.gov

OFFICIAL BUSINESS
PENALTY FOR PRIVATE USE, \$300

SOCIAL SECURITY ADMINISTRATION
NORTHEASTERN PSC
BIRMINGHAM SOCIAL SECURITY CENTER
100 REV ABRAHAM WOODS JR BLVD
BIRMINGHAM, AL 35285-0001

NC#: 11B1382J53075

Over

1981174

Your New Benefit Amount

BENEFICIARY'S NAME: MATTIE L WILLIAMS

Your Social Security benefits will increase by 3.6 percent in 2012 because of a rise in the cost of living. You can use this letter when you need proof of your benefit amount to receive food, rent, or energy assistance; bank loans; or for other business.

How Much Will I Get And When?

- Your monthly amount (before deductions) is \$578.00
- The amount we deduct for Medicare medical insurance is \$0.00
(If you did not have Medicare as of Nov. 17, 2011, or if someone else pays your premium, we show \$0.00.)
- The amount we deduct for your Medicare prescription drug plan is \$0.00
(If you did not elect withholding as of Nov. 1, 2011, we show \$0.00.)
- The amount we deduct for voluntary Federal tax withholding is \$0.00
(If you did not elect voluntary Federal tax withholding as of Nov. 17, 2011, we show \$0.00.)
- After taking any other deductions, we will deposit \$578.00 into your bank account on Jan. 3, 2012.

If you disagree with any of these amounts, you must write to us within 60 days from the date you receive this letter. We would be happy to review the amounts.

What If I Have Questions?

Please visit our website at www.socialsecurity.gov for more information and a variety of online services. You also can call 1-800-772-1213 and speak to a representative from 7 a.m. until 7 p.m., Monday through Friday. Recorded information and services are available 24 hours a day. Our lines are busiest early in the week, early in the month, as well as during the week between Christmas and New Year's Day; it is best to call at other times. If you are deaf or hard of hearing, call our TTY number, 1-800-325-0778. If you are outside the United States, you can contact any U.S. embassy or consulate office, or the Veterans Affairs Regional Office in Manila. Please have your Social Security claim number available when you call or visit and include it on any letter you send to Social Security. If you are inside the United States, and need assistance of any kind, you also can visit your local office.

THIRD FLOOR
5000 WISSAHICKON AVE
PHILADELPHIA PA

RECEIVED

98 SEP 14 PM 2:55

RUBIN MOGUL, ESQUIRE
I.D. No. 08573
19 West Lancaster Avenue
Post Office Box 548
Ardmore, Pennsylvania 19003
(610) 649-5458

PRO PROTHY

Attorney for Plaintiff

SUZANNE WILLIAMSON, A/K/A
SUZANNE WILLIAMS

IN THE COURT OF COMMON PLEAS OF
PHILADELPHIA, PENNSYLVANIA

FAMILY DIVISION - IN DIVORCE

- vs -

ALPHONSO W. WILLIAMSON

DECEMBER TERM, 1992. NO. 7404

PLAINTIFF'S NOTICE TO RETAKE PRIOR SURNAME

Notice is hereby given that Suzanne Williamson, also known as Suzanne Williams, having been granted a Final Decree in Divorce on the 30th day of November, 1993, elects to retake and use her prior surname.

Suzanne Williamson
Suzanne Williamson
Married Name *A/K/A Suzanne Williams*

TO BE KNOWN AS

Suzanne Williams
Suzanne Williams
Prior Surname

Rubin Mogul
Rubin Mogul, Esquire
Attorney for Plaintiff

Subscribed, sworn to and acknowledged before me by
Suzanne Williamson, also known as Suzanne Williams, to be her act and deed
the purposes therein intended, on the *3rd* day of *September*,

Nina E. Tafel
Notary Public

Notarial Seal
Nina E. Tafel, Notary Public
Philadelphia, Philadelphia County
Commission Expires June 19, 2000



STATE SENATOR

LeAnna M. Washington

Senate Box 203004

Harrisburg, PA 17120-3004

PRSRT STD
U.S. POSTAGE
PAID
HARRISBURG, PA
PERMIT NO. 603

Or Current Resident

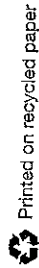
*****ECRWSH**C 050

Mattie Lee Williams
1321 E Cardeza St
Philadelphia PA 19119-1546

84

84

14989



Printed on recycled paper

Beat the Heat This Summer

Tips to stay cool when temperatures rise

This year has already brought record-breaking heat to the region and this summer promises to be one of the hottest on record.

When the temperatures rise, it is important to take precautions to avoid heat-related illness, such as heat exhaustion. Signs of heat exhaustion include heavy sweating, paleness, muscle cramps, weakness, tiredness, dizziness, headache, nausea, vomiting and fainting.

The Centers for Disease Control provide the following tips to cool your body to prevent or aid heat illness:

- *Drink cool, nonalcoholic beverages.*
- *Rest.*
- *Take a cool shower, bath, or sponge bath.*
- *Seek an air-conditioned environment.*
- *Wear lightweight clothing.*

Be sure to check on your neighbors, family and friends – especially the elderly and those who are especially sensitive to heat – during dangerously hot days. Never leave children or pets unattended in an enclosed car.

West Oak Lane Senior Center

is offering a cooling center for those who need to beat the heat:

7210-18 Ogontz Avenue
Philadelphia, PA 19138
Telephone: (215) 686-1697

Hours:

Monday, Tuesday, Thursday, & Friday
8:30 a.m. to 5 p.m.

Extended Hours:

Wednesday
8:30 a.m. to 8 p.m.

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

VIVIETTE APPLEWHITE, *et al.*,
Petitioners,

v.

THE COMMONWEALTH OF
PENNSYLVANIA, THOMAS CORBETT, :
Governor, and CAROL AICHELE, :
Secretary of the Commonwealth, :
Respondents.

Case No. 330 MD 2012

DECLARATION OF MARK WOLOSIK

I, Mark Wolosik, hereby declare as follows:

1. I am the Allegheny County Elections Division Manager. I have worked in the Elections Division for more than 40 years, since 1971. I have been the Division Director since 1991.
2. I testified at the trial in this case on Friday, July 27. See Transcript at 565-97.
3. County elections divisions, including mine in Allegheny County, are responsible for entering new voter registrations and making changes to existing ones. Our staff must enter and/or verify data, but as soon as we do so it automatically gets uploaded to the SURE database system and anyone with access to the SURE database should be able to ascertain whether that person is registered.

4. Recently, the delay in entering new voter registrations has been up to about two weeks.

5. The majority of new registrations now coming in are from third-party voter-registration drives. This is typical for a presidential election year.

6. While registrations have been lagging behind the number of new registrations we received in 2004 and 2008, in the past few weeks we have seen a steady increase in volume.

7. Every week we get a new batch of at least three thousand new registrations.

8. These deliveries of large numbers of registrations create delays in processing.

9. Indeed, we working hard to maintain the two-week turnaround time, which is our goal.

10. If history is a guide, we expect the number of registrations to increase even further as we reach the October 9 deadline for new registrations. Most of those last-minute registrations will come from third-party registration drives.

11. Our goal is to have all new registrations entered by October 16, but I am unable to give assurances that we will be successful in meeting that deadline. It will depend on how many new registrations we receive at the last minute. Our final deadline for entry of ALL new voter registrations is October 19, and we will continue to pay people overtime and add additional temporary workers to ensure that registrations are entered by that date.

12. It is important to remember that the delay in processing on our end does not include delays created by the third-party registration groups. What I mean by that is that these groups collect relatively large numbers of registrations and then bring them in all at once. Therefore, they could collect some registration applications on day 1 but not actually bring it in until day 14, when they have what they feel is a critical mass. We have seen registration

applications that have been two weeks old or even older when we first receive them in the office.

13. Accordingly, when you add the delay in delivery by the third-party registration groups to our processing time, it could be a month or maybe even more after the voter filled out his or her form before they are entered into the SURE database. However, we will ensure that all voters are entered into the SURE database by October 19, as per the procedures outlined in paragraph 11, *supra*.

14. Consequently, some voters registering between now and the deadline on October 9 will probably not show up in the SURE database until close to or on the October 19 deadline.

15. There are instances when poll workers are unable to verify that a voter is properly registered. The same could be true of Department of State employees doing a quick search to see if a person is registered.

16. Reasons that a someone checking the SURE database might not find the voter are:
a) the name is misspelled in the database (it could be a data-entry error or sometimes the handwriting on the application was difficult to read); b) the first and last names in the database are reversed (voters sometimes reverse the names on the application); c) there been a name change, often because of marriage; or d) there are hyphen and space issues, i.e., they are either present or wrongly added or omitted.

17. Unless the person checking the registration has full access to SURE, as opposed to just the "portal access," he or she may or may not be able to do a more detailed search, based on such matches as address and/or date of birth. Different users have different levels of access. For instance, I as an administrator have full access, but a staff person may have more limited access and not be able to perform as many searches or access as many data fields. Accordingly,

depending on the user's level of authorized access he or she may or may not be able to confirm someone's registration, if there are errors like the ones I mentioned above, even though they have been registered for many years.

18. I declare that the facts set forth above are true and correct to the best of my knowledge, information and belief and are made subject to the penalties of 18 P.S. § 4904 relating to unsworn falsification to authorities.

Dated: 9/24/2012



Mark Wolosik
Allegheny County Elections Division Manager