IN THE COMMONWEALTH COURT OF PENNSYLVANIA

No. 330 MD 2012

VIVIETTE APPLEWHITE; WILOLA SHINHOLSTER LEE; GLORIA CUTTINO; NADINE MARSH; BEA BOOKLER; JOYCE BLOCK; 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.

PETITIONERS' PRE-TRIAL STATEMENT AND APPLICATION FOR SPECIAL RELIEF IN THE NATURE OF PRELIMINARY AND PERMANENT INJUNCTIONS

David P. Gersch
Arnold & Porter LLP
555 Twelfth Street, NW
Washington, DC 20004-1206

Witold J. Walczak
Attorney ID No. 62976
ACLU of Pennsylvania
313 Atwood Street
Pittsburgh, PA 15213

Jennifer R. Clarke
Attorney ID No. 49836
Public Interest Law Center of Philadelphia
1709 Benjamin Franklin Parkway, 2nd Floor
Philadelphia, PA 19103

Marian K. Schneider
Attorney ID No. 50337
Advancement Project
295 E. Swedesford Road
Wayne, PA 19087

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INTRODUCTION

By the time of trial, sixteen months will have passed since the Act of March 14, 2012, P.L. 195, No. 18 ("Photo ID Law," the "Law" or "Act 18") was adopted. Those sixteen months have reinforced what is apparent from the face of the statute – the Photo ID Law cannot be implemented in a way to get identification ("ID") to all voters who need it and thus cannot be implemented in a way to forestall the disenfranchisement of at least tens of thousands of voters.

The gap between the number of people with IDs that can be used to vote and registered voters remains unconstitutionally and unconscionably large. The Court previously estimated that between 1% and 9% of registered voters lacked ID.[1] The Department of State's ("DOS") Director of Policy Rebecca Oyler – who provided the original 1% estimate – now understands the true number of registered voters without Pennsylvania Department of Transportation ("PennDOT") identification realistically to be about 4-5% (roughly 328,000 to 410,000). This 4-5% estimate is the range of voters without acceptable identification that the Department of State has used internally for its own planning purposes with respect to the Photo ID Law. Nevertheless, Respondents have issued just 16,754 free IDs for voting (as of June 7, 2013). By any measure, that leaves tens of thousands – and likely hundreds of thousands – of voters without identification. Since the November 2012 election, Respondents have effectively stopped all proactive efforts to get ID to voters, and the issuance of voter IDs has dropped to about 100 per month. There is no basis to believe that the gap will ever be closed.

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[1] *Applewhite v. Commonwealth*, No. 330 M.D. 2012, 2012 WL 4497211, at *5 (Pa. Commw. Ct. Oct. 2, 2012) ("*Applewhite III*"); *Applewhite v. Commonwealth*, No. 330 M.D. 2012, 2012 WL 3332376, at *3 n.16 (Pa. Commw. Ct. Aug. 15, 2012) ("*Applewhite I*").

The evidence will show that the burdens of the law disproportionately fall on the elderly, disabled, ill, financially disadvantaged, minorities, non-English speakers, and students, among others. And evidence from the Respondents themselves will show that they recognized that voters would invariably be disenfranchised based on the facial operation of the statute. With no evidence of fraud necessitating more restrictive rules for voting, the disenfranchisement of so many voters can serve only to undermine the integrity of elections in Pennsylvania. The Court should therefore declare the law unconstitutional on its face – or, at the very least, as applied to voters who lack identification.

Regardless of whether the Court declares Act 18 unconstitutional on its face or as applied to voters who lack identification, the Court should permanently enjoin the enforcement of its in-person voter provisions.[2] In the meantime, the preliminary injunction expired with the May 21, 2013 election. While this Court and the Supreme Court consider the final merits of this case, the preliminary injunction should be extended to all future elections because nothing has materially changed since the Court's October 2, 2012 Order and it is the height of judicial inefficiency to require a new preliminary injunction proceeding for each separate election. Given experience in Pennsylvania's recent elections, the preliminary injunction should be modified to no longer permit poll workers to ask for, but not require, identification.

DISCLOSURES

In accordance with the Court's instructions, Petitioners do not intend to duplicate the record already established during the two prior hearings and will treat that record as part of the trial on the merits. *See* Hr'g Tr. 36:23-37:6, Dec. 13, 2012 (Status Conference) (confirming that

[2] Petitioners are not challenging the absentee ballot provisions of the Photo ID Law.

"at the trial on the merits" parties can just rely on what's already in the record and treat that as part of the entire record"); Order, May 24, 2013, at 6 (recognizing that evidence from dismissed Petitioners is already in the record). For the Court's convenience, attached as Exhibit 1 is an overview of certain of the pertinent evidence from the existing record.

Attached as Exhibit 2 is the list of Petitioners' Witnesses. Although Petitioners have included expert witnesses who have previously been disclosed, Petitioners will supplement their witness list when they disclose expert reports on July 1, 2013 in accordance with the Court's Scheduling Order. In addition, Petitioners are continuing to investigate this case and reserve the right to supplement their Witness List with respect to fact witnesses who they identify from the databases that Respondents did not timely produce.[3]

Attached as Exhibit 3 is the list of Petitioners' Exhibits, except for exhibits that may be used by Petitioners' experts which will be supplemented when expert reports are disclosed on July 1, 2013. Petitioners reserve the right to amend and supplement this Exhibit List because, among other reasons, Respondents have only recently produced, and continue still to produce, responsive documents.

Attached as Exhibits 4-9 are stipulations of the parties:

- Exhibit 4: July 12, 2012 Stipulation on In-Person Voter Fraud for *Applewhite, et al. v. Commonwealth, et al.* [Admitted Pet'rs' Ex. 15];

[3] Petitioners intend to schedule videotaped trial preservation depositions of certain fact witnesses who cannot testify live – *i.e.*, voters who are able to vote in person because the polls are very close to them, but cannot get to PennDOT to obtain an identification and cannot get to Harrisburg to have their voices heard in the courtroom. Petitioners have informed Respondents of these trial preservation depositions and will work cooperatively to schedule them with Respondents' counsel.

- Exhibit 5: July 15, 2012 Stipulation Regarding Pennsylvania Department of Transportation Web Searches for *Applewhite, et al. v. Commonwealth, et al.* With Attached Exhibits [Admitted Pet'rs' Ex. 25];
- Exhibit 6: July 19, 2012 Stipulation on Authenticity of [Mike Turzai] Video for *Applewhite, et al. v. Commonwealth, et al*. [Admitted Pet'rs' Ex. 41];
- Exhibit 7: June 6, 2013 Stipulation on Statements of Representative Daryl D. Metcalfe;
- Exhibit 8: June 12, 2013 Stipulation on Statements of Governor and Secretary Aichele; and
- Exhibit 9: June 14, 2013 Stipulation on Pennsylvania Department of Transportation Budget Request for 2013-2014.

In addition to these stipulations, Respondents have stipulated that any press releases listed on the Department of State website are authentic. *See* Dep. of R. Ruman, June 5, 2013, at 144:14-22. Petitioners anticipate that the parties will continue to work cooperatively in advance of trial to reach certain additional stipulations.

PROCEDURAL HISTORY AND LAW OF THE CASE

Petitioners filed their original Petition for Review on May 1, 2012, seeking to enjoin implementation of the Photo ID Law, in order to protect the fundamental right to vote guaranteed by the Pennsylvania Constitution.

On August 15, 2012, after a six-day hearing, this Court initially denied Petitioners' motion for a preliminary injunction seeking to bar implementation of the Photo ID Law pending resolution of this lawsuit. *Applewhite I*, 2012 WL 3332376. The Court concluded that Petitioners were unlikely to succeed in their "facial challenge" to the Photo ID Law, on the

ground that "considering the statute's broad application to all Pennsylvania voters, it imposes only a limited burden on voters' rights, and the burden does not outweigh the statute's plainly legitimate sweep." *Id.* at *9. As discussed below, that decision was based largely on the Court's predictive judgment that the Commonwealth would issue IDs to those in need and thus forestall disenfranchisement. The Court also failed to find that voting was a fundamental right requiring strict scrutiny, but noted that a different result would have been likely if the Court had applied the type of strict scrutiny applicable to fundamental rights. *Id*. at *29.

On September 18, 2012, the Pennsylvania Supreme Court vacated and remanded. *Applewhite v. Commonwealth*, 54 A.3d 1 (Pa. 2012) (*"Applewhite II").* The Supreme Court recognized that the Respondents now "agreed that the right to vote in Pennsylvania, as vested in eligible, qualified voters, is a fundamental one." *Id*. at 3. The Court held that Petitioners had properly stated a "facial challenge" to the implementation of the Photo ID Law and that this Court had erred in relying on a "predictive judgment" that Respondents' efforts to educate the voting public and issue photo ID to voters "will ultimately be sufficient to forestall the possibility of disenfranchisement." *Id.* at 4-5. The Supreme Court further held that Respondents had failed to comply with the Legislature's mandate in the Photo ID Law to provide "liberal access" to PennDOT IDs, and that Respondents' plan to offer an alternative DOS ID as a "safety net" was "still contrary to the Law's liberal access requirement." *Id.* at 4. The Supreme Court accordingly directed this Court to enter a preliminary injunction unless: (1) "the procedures being used for deployment of the [DOS ID] cards comport with the requirement of liberal access which the General Assembly attached to the issuance of PennDOT identification cards," and (2) this Court was "convinced . . . that there will be no voter disenfranchisement arising out of the

Commonwealth's implementation of a voter identification requirement for purposes of the upcoming election." *Id.* at 5.

On October 2, 2012, after a further two-day hearing on remand, this Court issued a preliminary injunction, concluding that Respondents had satisfied neither of the Supreme Court's prongs for avoiding a preliminary injunction. *Applewhite III*, 2012 WL 4497211. In particular, Respondents did not "cure the deficiency in liberal access identified by the Supreme Court," *id.* at *2, and the Court was "not still convinced in [its] predictive judgment that there will be no voter disenfranchisement arising out of the Commonwealth's implementation of a voter identification requirement for purposes of the upcoming election." *Id.* at *3. Accordingly, the Court enjoined implementation of the Photo ID Law for purposes of the November 6, 2012 election, such that photo ID could be requested by poll workers, but was not required for casting a regular ballot. *Id.* at *8. On February 19, 2013, the parties stipulated to and the Court ordered that the preliminary injunction be extended to cover the May 2013 elections as well. *See* Scheduling Order IV, Feb. 19, 2013, at 2-3.

On February 5, 2013, Petitioners filed the operative First Amended Petition for Review to conform their allegations to the events that have transpired since the filing of the original Petition for Review and to better track the direction provided by the Supreme Court in *Applewhite II*. The First Amended Petition asserted four claims against Respondents for violations of (1) the Photo ID Law itself, (2) the fundamental right to vote, (3) the equal protection guarantees set forth in Article I, Sections 1 and 26, and (4) the exclusive qualifications to vote set forth in Article VII, Section 1. *See* First Am. Pet. ¶¶ 168, 180, 193, 200.

On May 24, 2013, the Court dismissed the fourth count alleging that the Photo ID Law imposed an additional qualification to vote. *See* Order, May 24, 2013, at 8. Following the

direction of the Supreme Court in *Applewhite II*, the Court denied Respondents' Preliminary Objection to the fundamental right to vote claim, noting that such a claim was valid if the "implementation of Act 18 will result in disenfranchisement." *Id*.

The proceedings to date have focused on whether to issue a preliminary injunction. These proceedings, however, frame certain issues for the upcoming trial on the merits. In particular, the Supreme Court held that Respondents' failure to comply with the statutory safeguards intended by the General Assembly is alone grounds to issue an injunction. *See Applewhite II*, 54 A.3d at 5. The Supreme Court framed the constitutional question as whether the law can ever be implemented, as it is drafted, "to forestall the possibility of disenfranchisement." *Id*. at 4. The Court held that the photo identification requirement cannot be enforced unless "there will be no voter disenfranchisement arising out of the Commonwealth's implementation of a voter identification requirement." *Id*. The Supreme Court also made clear that this Court cannot rely on "a mere predictive judgment based primarily on the assurances of government officials" to find that there will be no disenfranchisement. *Id*.

Finally, the Supreme Court recognized that the Photo ID Law's burdens fall most heavily on "members of some of the most vulnerable segments of our society (the elderly, disabled members of our community, and the financially disadvantaged)." *Id*. at 4. And the Supreme Court recognized that state officials have conceded that "if the Law is enforced in a manner that prevents qualified and eligible electors from voting, the integrity of the upcoming General Election will be impaired." *Id*. at 4.[4]

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[4] As the Supreme Court noted, Petitioners agreed at oral argument that "in the abstract," an identification requirement could be permissible. *Id*. at 4-5. For example, Virginia adopted an identification requirement and mailed all registered voters an acceptable form of identification on

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STATEMENT OF CASE

I. THE PHOTO ID LAW IS UNCONSTITUTIONAL ON ITS FACE.

The Photo ID Law is unconstitutional on its face because it can never be implemented by its terms in a way that does not disenfranchise large numbers of voters who come, primarily, from society's most vulnerable segments. And even for voters not actually disenfranchised because they may take on the undue burden of obtaining unnecessary identification, their fundamental right to vote will be unconstitutionally burdened if the law is not enjoined.

A. Voting Is a Fundamental Right that Cannot Be Infringed under the Guise of an Election "Regulation."

Voting is a fundamental right, whose "enjoyment . . . must not be impaired by the regulation." *Page v. Allen*, 58 Pa. 338, 347 (1868); *see also Kuznik v. Westmoreland Cnty. Bd. of Comm'rs*, 588 Pa. 95, 116, 902 A.2d 476, 488 (2006) (regulation of voting machine issue involved the fundamental right to vote). Two provisions of the Pennsylvania Constitution expressly secure the right to vote. Article I, Section 5 provides that "[e]lections shall be free and equal," and that without exception, "no power, civil or military, shall at any time interfere to prevent the free exercise of the right of suffrage." Pa. Const. Art. I, § 5. Article VII, Section 1 sets forth exactly who is constitutionally entitled to vote.[5] Pa. Const. Art. VII, § 1. Respondents,

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the day the law was signed by the Governor. In Michigan, a voter can vote without identification by signing a simple affidavit at the polls. In Georgia, everyone can vote by absentee ballot. Similarly, in Georgia, acceptable identification is guaranteed to be free and available from locations in every county, mobile ID vehicles were deployed, and the law was implemented by its terms over a period of 2 years. The Pennsylvania law provides for no such safeguards against disenfranchisement and can only be implemented in a way that effectively guarantees that the most vulnerable in society will be disenfranchised.

[5] Article VII, Section 1 provides a person "shall be entitled to vote" if he or she is a citizen of the United States, over the age of eighteen, a resident of the Commonwealth of Pennsylvania; and a resident of the election district in which the person offers to vote.

who argued before the initial hearing that voting was not a fundamental right,[6] now concede that "the right to vote in Pennsylvania" is a "fundamental one." *Applewhite II*, 54 A.3d at 3.

Because the right to vote is fundamental, the legislature lacks the power to enact election regulations that have the effect of denying the franchise to eligible voters. For at least a century, the Pennsylvania Supreme Court has held that "elections are free and equal within the meaning of the Constitution . . . when the regulation of the right to exercise the franchise does not deny the franchise itself, or make it so difficult as to amount to a denial." *Winston v. Moore*, 244 Pa. 447, 457, 91 A. 520, 523 (1914). This is because voting is a "sacred right" whose "enjoyment . . . must not be impaired by . . . regulation." *Page*, 58 Pa. at 347; *see also Norwood Election Contest Case*, 382, Pa. 547, 549, 116 A.2d 552, 553 (1955) ("[T]he right of suffrage is the most treasured prerogative of citizenship" and "may not be impaired or infringed upon in any way except through the fault of the voter himself.").[7]

A law is facially unconstitutional when "a 'substantial number' of its applications are unconstitutional, 'judged in relation to the statute's plainly legitimate sweep.'" *Clifton v. Allegheny Cnty.*, 600 Pa. 662, 704 n.35, 969 A.2d 1197, 1222 n.35 (2009) (quoting *Wash. State Grange v. Wash. State Republican Party*, 552 U.S. 442, 1191 n.6 (2008)); *see also id.* at 704, 969 A.2d at 1222 (explaining that to establish a facial challenge, "the invalid applications of a statute must be real and substantial, and are judged in relation to the statute's plainly legitimate sweep" (citations and internal quotation marks omitted)); *id.* at 705 n.36, 969 A.2d at 1223 n.36 ("Under

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[6] Resp'ts' Br. in Opposition to Pet'rs' Application for Preliminary Injunction at 23 (July 18, 2012).

[7] In *Independence Party Nomination*, 208, Pa. 108, 57 A. 344 (1904), cited by the Court in its initial preliminary injunction decision, *Applewhite I*, 2012 WL 3332376, at 10 n.20, the Supreme Court cautioned that "anything beyond this [details of time, place, manner etc.] is not regulation but unconstitutional restriction." 208 Pa. at 112, 57 A. at 345.

the more lenient 'plainly legitimate sweep' standard, the challenger need only demonstrate that a 'substantial number' of the challenged statute's potential applications are unconstitutional.").[8]

Denying eligible voters the franchise is facially unconstitutional, even in cases involving a relatively small fraction of voters. *See Perles v. Cnty. Return Bd. of Northumberland Cnty.*, 415 Pa. 154, 158, 202 A.2d 538, 540 (1964) ("The disfranchisement of even one person validly exercising his right to vote is an extremely serious matter."); *In re Canvass of Absentee Ballots of 1967 Gen. Election*, 431 Pa. 165, 172, 245 A.2d 258, 262 (1968) ("The disfranchisement of 5,506 citizens . . . would be unconscionable."). For example, in *Harper v. Virginia State Board of Elections*, 383 U.S. 663 (1966), the U.S. Supreme Court facially invalidated a state statute that imposed a poll tax as "a prerequisite to voting." *Id.* at 669. It was irrelevant that many voters presumably could afford to pay the poll tax without any difficulty. *See id.* at 668 (finding it irrelevant "whether the citizen, otherwise qualified to vote, has $1.50 in his pocket or nothing at all, pays the fee or fails to pay it").

Similarly, in *Dunn v. Blumstein*, 405 U.S. 330 (1972), the Court struck down on facial grounds a state's "durational residence requirement" because it "bar[red] newly arrived residents from the franchise," *id.* at 345, even though the requirement likely impacted no more than roughly three to six percent of the population. *Id.* at 335 n.5. As discussed above, the evidence

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[8] Respondents mistakenly have relied on a different standard suggested in the U.S. Supreme Court's 1987 decision in *United States v. Salerno*, 481 U.S. 739 (1987). *Compare Clifton*, 600 Pa. at 705, n.36, 969 A.2d at 1223 n.36 ("Under the *Salerno* standard, the challenger must establish that there is no set of circumstances under which the Act would be valid."), *with* Resp'ts' Mem. of Law in Support of Prelim. Objections to the Amended Pet. for Review at 11 (Apr. 22, 2013) ("A statute is facially unconstitutional only where no set of circumstances exist under which the statute would be valid."). As the Pennsylvania Supreme Court recognized in 2009, "[r]ecently . . . the Court seems to have settled on the 'plainly legitimate sweep' standard," and has not applied the *Salerno* standard to evaluate facial challenges. *Clifton*, 600 Pa. at 705, 969 A.2d at 1223.

in this case has and will show that approximately the same percentage of Pennsylvania voters lack acceptable identification and will therefore be unconstitutionally impacted by the Photo ID Law.

The Photo ID Law cannot be saved by simply labeling it an "election regulation." Going back to the early "election regulation" cases, the Pennsylvania Supreme Court carefully analyzed whether the regulations in those cases could – as a factual matter – easily be complied with at the polls by otherwise qualified voters. *See, e.g.*, *Cusick's Election*, 136 Pa. 459, 20 A. 574 (1890); *De Walt v. Bartley*, 146 Pa. 529, 24 A. 185 (1892). For example, in *Cusick's Election*, the Court analyzed at length each of the requirements for the election day affidavit required of voters who had not pre-registered, and found that all qualified voters could easily and without burden truthfully sign the necessary affidavit at the polls. 136 Pa. at 470-75, 20 A. at 576-78. Nothing in *Cusick* suggests that the General Assembly has the constitutional power to impose requirements that cannot easily be satisfied by otherwise qualified voters.

Similarly, in *De Walt v. Bartley*, the Pennsylvania Supreme Court upheld the legislature's power to "regulate elections . . . so long as it merely regulates the exercise of the elective franchise, and does not deny the franchise itself." 145 Pa. at 540, 24 A. at 186 (internal quotations and citations omitted). The Court explained that "[t]he test is whether such legislation denies the franchise, or renders its exercise so difficult and inconvenient as to amount to a denial." *Id*. *De Walt* involved regulations that were designed to guarantee the right to a secret ballot without voter intimidation and thus were intended to expand and protect the franchise. *Id*. Nothing in *De Walt* stands for the proposition that the legislature can "regulate" elections in a way that threatens to disenfranchise qualified voters. To the contrary, the Supreme Court upheld that election regulation precisely because the law "carefully preserves the right of every citizen

to vote for any candidate whose name is not on the official ballot [by writing in the name or using a sticker], and this is done in a manner which does not impose any unnecessary inconvenience upon the voter." *Id*. at 543, 24 A. at 187-88.

As discussed below, no one can say that the Photo ID Law "carefully preserves the right of every citizen to vote" or that the Law "does not impose any unnecessary inconvenience upon the voter." *Id*. Because "implementation of Act 18 will result in disenfranchisement," Order, May 24, 2013, at 8, Act 18 violates the fundamental right to vote and cannot stand.

B. The Express Terms of the Photo ID Law Violate the Fundamental Right to Vote.

The evidence adduced at the prior hearings establishes that, by its express terms, the Photo ID Law inevitably will lead to disenfranchisement. Evidence about how the Law has been implemented in accordance with its terms will further show that the Law will unavoidably lead to a substantial number of unconstitutional applications and is thus facially unconstitutional.

(i) The Photo ID Law Does Not Guarantee Any Voter a Right to Identification.

The Photo ID Law violates the fundamental right to vote by requiring that voters show photo identification as a condition of voting while simultaneously failing to provide a form of photo ID that all voters can get. It is not seriously contested that this is a facial violation of the fundamental right to vote secured by the express provisions of Article I, Section 5 and Article VII, Section 1 of the Pennsylvania Constitution. Respondents recently conceded this point, saying that "[i]f proof of identification is not liberally available to registered voters . . . , the Voter ID Law cannot be administered . . . consistently with constitutional requirements." Resp'ts' Resp. to Pet'rs' Status Report of May 22, 2013, Concerning Discovery Issues at 11 (May 24, 2013) ("Resp'ts' Discovery Resp.").

As construed by the Supreme Court, the Photo ID Law would permit any voter to obtain without charge the Department of Transportation non-driver ID ("PennDOT ID") card authorized by 75 Pa. Cons. Stat. § 1510(b) based on a simple affirmation that the voter (1) lacks ID, and (2) requires ID to vote. The Supreme Court characterized this as "liberal access" to PennDOT IDs. *Applewhite II*, 54 A.3d at 3. PennDOT, however, cannot provide such IDs because of security concerns, a justification accepted by the Supreme Court as a "good reason," *id.*, with the result that the Photo ID Law lacks a feasible provision for an identification card that all voters are eligible to obtain.

Having conceded that this is a constitutional defect, Respondents defend the Law by promising that it will provide voters who need it with a DOS ID card that is neither required by nor identified in the statute. Respondents' position that Pennsylvania voters must depend on the discretion of the executive branch as to whether they will or will not be able to obtain ID necessary to exercise the franchise wholly misunderstands the point of Constitutional rights. It is in the very nature of Constitutional rights that they safeguard citizens ***against*** the Government. To say as Respondents now contend that the fundamental right to vote should be dependent on the discretion of the government would turn the Constitution on its head.

The U.S. Supreme Court's recent decision in *United States v. Stevens*, 559 U.S. 460, 130 S. Ct. 1577 (2010), illustrates this principle. There, the Supreme Court considered a facial challenge to the constitutionality of a federal criminal statute prohibiting the creation, sale, or possession of depictions of animal cruelty. 130 S. Ct. at 1582-83. The Court concluded that the statute was facially overbroad because it "applies to common depictions of ordinary and lawful activities," such as depictions of hunting, fishing, and livestock slaughter. *Id.* at 1587, 1589. In

defending the statute, the government took the position that it would not prosecute offenders under the statute outside the context of "specific types of 'extreme' material." *Id.* at 1587.

Writing for the Court in an 8-1 opinion, Chief Justice Roberts rejected the notion that the government could save the statute by promising only to implement it in a constitutional manner: "Not to worry, the Government says: The Executive Branch construes [the statute] to reach only extreme cruelty, and it neither has brought nor will bring a prosecution for anything less." *Id.* at 1591 (citations and internal quotation marks omitted). The Chief Justice explained that the government's position misconceived the notion of constitutional rights, ruling that "the First Amendment protects ***against*** the Government; it does not leave us at the mercy of *noblesse oblige.* We would not uphold an unconstitutional statute merely because the Government promised to use it responsibly." *Id* (emphasis added). The Third Circuit likewise held that "a promise by the government that it will interpret statutory language in a narrow, constitutional manner cannot, without more, save a potentially unconstitutionally overbroad statute." *Free Speech Coalition, Inc. v. Attorney Gen.*, 677 F.3d 519, 539 n.15 (3d Cir. 2012); *see also Commonwealth v. Omar*, 602 Pa. 595, 608, 981 A.2d 179, 187 (2009) (facially unconstitutional statute could not be saved by proposed amendment to statute until the proposed amendatory language was enacted into law).

The unremarkable principle of these decisions is that the Commonwealth cannot immunize an unconstitutional statute from challenge by executive pronouncement. The DOS ID card, which is nothing more than a litigation-driven, discretionary creation of Respondents, does not alter the basic unconstitutionality of the Law. The voters of Pennsylvania are not required to depend on the unbridled discretion of state agencies to exercise their right to vote.

Indeed, this case already illustrates Respondents' capricious position. Initially, when the Law was passed, there was no DOS ID. Respondents' initial position was that voters had to try to obtain the PennDOT ID, even though many could not do so,[9] and even though it had rigorous security requirements that respondents conceded were entirely unnecessary for voting.[10] When, as a result of this lawsuit, Respondents decided to create the DOS ID card, they did so only with the unnecessary restriction that voters must first demonstrate that they could not obtain PennDOT ID.[11] Only after the Supreme Court made clear that Respondents' approach was unduly restrictive, did Respondents discover what they now say is their "committed position," to make the DOS ID available on a liberal basis.[12] Respondents' historical position in this matter underscores exactly why the exercise of Constitutional rights is not, and cannot be, left to the discretion of executive agencies. The tenuous nature of the DOS ID card is further confirmed by the fact that proponents of the Photo ID Law are now on record saying Respondents should never have created it, that they should eliminate the DOS ID altogether, and that there is no statutory authority for issuing the card. It is worth repeating, as Chief Justice Roberts aptly put it in *Stevens*, the point of a constitutional right is that it "protects ***against*** the Government; it does not leave us at the mercy of *noblesse oblige*." 130 S. Ct. at 1591 (emphasis added). Pennsylvania's

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[9] *See Applewhite II*, 54 A.3d at 4; *Applewhite III*, 2012 WL 4497211, at *2.

[10] *See, e.g.*, Hr'g Tr. at 781:1-20, July 27, 2012 (J. Marks); Hr'g Tr. at 994:22-95:1, Aug. 1, 2012 (C. Aichele).

[11] *See, e.g.*, Hr'g Tr. at 709:12-20, July 27, 2012 (K. Myers); Hr'g Tr. at 24:13:20, Sept. 25, 2012 (K. Myers).

[12] *Compare* Resp'ts' Discovery Resp. at 11, *with, e.g.*, Hr'g Tr. at 24:22-25:1, Sept. 25, 2012 (K. Myers).

Constitution guarantees its citizens the right to vote, and that right does not exist merely at the whim of Respondents.[13]

(ii) The Photo ID Law's Requirement of Getting to PennDOT Will Disenfranchise Voters.

Wholly apart from the failure to mandate a form of identification that all voters can get, the Photo ID Law also fails to make identification available at locations convenient for voters. Thus, the 75 Pa. C.S. § 1510(b) PennDOT ID that the Law contemplates as the universally available ID – and the DOS ID that Respondents say will take the place of Section 1510(b) identification – is available only at some PennDOT drivers licensing centers on certain days that those centers are open (and ***not*** at PennDOT's photo centers). It is apparent on the face of the Photo ID Law that, providing the universal ID for voting only at these PennDOT's locations unduly infringes on the right to vote. There are only 67 PennDOT locations that issue free ID for voting. Nine counties lack any such location. And 22 counties have a PennDOT facility that is open only two or fewer days a week. Hours are also often limited. Restricting the locations for obtaining ID necessary to vote in this manner is unnecessary and unrelated to any legitimate – let

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[13] Respondents' latest wrinkle is to invite the Court to issue some sort of unspecified "judicial declaration" that the Photo ID Law would be unconstitutional in the absence of "the DOS ID program (or its functional equivalent)." *See* Resp'ts' Discovery Resp. at 11. This naked invitation for the Court to invade the legislature's province and rewrite the Law is impermissible as a basic matter of separation of powers. Respondents cite no support for the Court's authority to rewrite the law in this manner, and none exists. The Pennsylvania Supreme Court long has held that courts "have no power to . . . rewrite Legislative Acts or Charters, desirable as that sometimes would be." *Mt. Lebanon v. County Bd. of Elections of Allegheny Cnty.*, 470 Pa. 317, 321, 368 A.2d 648, 649-50 (1977) (quoting *Cali v. Philadelphia*, 406 Pa. 290, 312, 177 A.2d 824, 835 (1962)). This is because "under our basic form and system of Constitutional Government the power and duty of [the courts] is interpretative, not legislative." *Id.* at 321, 368 A.2d at 649 (quoting *Cali*, 406 Pa. at 312, 177 A.2d at 835). The Supreme Court's decision in *Heller v. Frankston*, 504 Pa. 528, 475 A.2d 1291 (1984), illustrates this basic principle. There, the Court refused the invitation to salvage a law found to be unconstitutional. The Court concluded: "it is not the role of this Court to design an alternative scheme which may pass constitutional muster." *Id.* at 537, 475 A.2d at 1296.

alone compelling – governmental objective. If one were trying to design a way to give voters the ID needed to vote, it is inconceivable that one would require voters to leave the county.

Respondents themselves agree that requiring the elderly, disabled and ill to obtain identification from the limited PennDOT locations will invariably lead to disenfranchisement. Discovery recently uncovered that, internally, Respondents concluded that, after analyzing the Law's facial requirements, there would inevitably be voters like Petitioner Bea Bookler who ***can*** get to one of the 9,300+ locally accessible polling places (and thus cannot vote absentee), but "illness or disability prevent[] him/her from obtaining necessary proof of ID" from one of PennDOT's limited, often distant and inaccessible drivers license centers.[14] According to the Departments of State and Aging, such voters will unavoidably be "disenfranchise[d] through happenstance beyond the control of the elector."[15] To alleviate this disenfranchisement, the Departments of State and Aging proposed as "a good solution" allowing voters who could not get to PennDOT because of illness or disability to vote by absentee ballot.[16] The Law was not changed. As a result, voters like Petitioner Bookler and many others will be disenfranchised by the facial operation of the statute.

(iii) The Photo ID Law's Facial Limitations on Acceptable Identification Will Disenfranchise Voters.

The Photo ID Law facially limits the forms of acceptable identification. Respondents acknowledge that that by narrowing the list of acceptable identifications, the General Assembly increased the number of voters who lack identification. Many proposals to expand the list of

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[14] *See* Memorandum from Offices of Policy and Legislative Affairs, Departments of Aging and State, to Office of Governor, Nov. 29, 2011, at 4 (Pet. Trial Ex. 1562).

[15] *Id*.

[16] *Id*.

acceptable identification were rejected by the General Assembly and by the Respondents. By so strictly limiting the forms of acceptable identification, the Photo ID Law increased the level of disenfranchisement and otherwise made it unnecessarily hard for many voters to exercise the franchise.

For example, Respondents recommended against allowing the more than 3,000 local municipalities[17] and other Pennsylvania government entities such as school districts to issue acceptable identification for voting, and rejected many forms of photo identification that are regularly accepted in everyday life, including corporate identification cards issued only after employees have proven their identity in compliance with the federal I-9 form requirements.[18]

Most egregiously, the Photo ID Law requires that identification have an expiration date and not be expired (with the exception of a 12-month grace period for PennDOT cards).[19] The evidence will show that the Department of State did not think expiration dates were necessary and recognized that including expiration dates would further limit those who could vote. But the General Assembly and Governor insisted on the expiration date requirements. In doing so, they facially eliminated large numbers of otherwise acceptable identification, such as college student IDs, Veterans IDs, and even many Commonwealth employee IDs, among others.

Expiration dates are wholly unnecessary to the supposed purpose of requiring identification at the polls – to prove that voters are who they say they are. As long as the voter

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[17] Municipal IDs are only valid for voting when issued to employees.

[18] *See* Requirements for the Federal Form I-9, available at http://www.uscis.gov/portal/site/uscis/menuitem.eb1d4c2a3e5b9ac89243c6a7543f6d1a/?vgnextoid=84c267ee5cb38210VgnVCM100000082ca60aRCRD&vgnextchannel=84c267ee5cb38210VgnVCM100000082ca60aRCRD.

[19] Only certain military IDs are excluded from the expiration date requirement but then only if they say that they are valid indefinitely.

looks like the person on the ID card, the name substantially conforms to the voting rolls, and the voter's signature matches the signature in the poll book, the supposed purpose of requiring photo identification is served. It is entirely irrelevant that a card may no longer be valid to drive, travel, or eat in a college dining hall. The ***only*** conceivable effect of this statutory requirement is to limit acceptable identification, increase burdens on voters, and inevitably disenfranchise voters by declaring photo identifications (such as Veterans cards, expired passports, and expired driver's licenses) unacceptable for voting. And Respondents' witnesses agree that this burden falls most heavily on the elderly, who are more likely to allow their driver's licenses to expire. The undisputed evidence at trial will show that this restriction alone invalidates hundreds of thousands of otherwise acceptable identification.

(iv) The Photo ID Law Contains No Safety Net Against Disenfranchisement.

Act 18 lacks the basic safety nets that are found in other states where identification requirements have been upheld.

In contrast to New Mexico, Georgia, and Indiana, Pennsylvania severely restricts who can vote by absentee ballot, which will inevitably lead to disenfranchisement. *See ACLU of N.M. v. Santillanes*, 546 F.3d 1313 (10th Cir. 2008) (upholding law in part because all registered voters have the option of voting absentee without identification); *Democratic Party of Ga., Inc. v. Perdue*, 707 S.E.2d 67 (Ga. 2011) (upholding law in part because every voter is eligible for absentee voting without identification, guaranteeing the fundamental right to vote); *see also* Ind. Code § 3-11-10-24 (all voters over the age of 65 automatically qualified to vote by absentee ballot without any photo identification requirement).

Unlike Michigan, Florida and Arizona, voters who lack identification cannot cast a regular ballot in Pennsylvania by signing a simple affidavit at the polls. *See In re Request for*

Advisory Opinion, 740 N.W.2d 444, 456-57 (2007) (noting that the Michigan statute does not impose a severe burden on voters because it "explicitly provides that an elector without photo identification need only sign an affidavit in the presence of an election inspector before being 'allowed to vote'"); *see also* Fla. Stat. §§ 101.043, 101.048 (2013); Ariz. Rev. Stat. Ann. § 16-584 (2013).

Absent any such safety net, Pennsylvania's Photo ID Law will invariably lead to disenfranchisement.[20]

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For each of these reasons and others that will be adduced at trial, the Law is facially unconstitutional.

C. The Burdens Imposed by the Photo ID Law Are Wholly Unnecessary and Are Not Justified by Any Compelling Reason.

Legislative incursions upon fundamental rights may be upheld only upon the strictest scrutiny. *See James v. SEPTA*, 505 Pa. 137, 145, 477 A.2d 1302, 1305-06 (1984) ("[W]here . . . a fundamental right has been burdened, another standard of review is applied: that of strict scrutiny."); *Schmehl v. Wegelin*, 592 Pa. 581, 585, 927 A.2d 183, 185, 188 (2007) (applying strict scrutiny to law that "burdened a parent's fundamental right to make decisions regarding the upbringing of his or her children" by providing for mandatory grandparent visitation); *Pa. Bar Ass'n v. Commonwealth*, 147 Pa. Cmwlth. 351, 356, 607 A.2d 850, 857 (1992) (applying strict scrutiny to law "impos[ing] a burden upon" attorneys' "reputation" rights by providing for the

[20] Respondents' witnesses conceded at the prior hearings that the Law's provisional ballot option at best will help only those who leave their IDs at home, but does not offer a practical remedy for those who lack identification. *See* Hr'g Tr. at 468:23-489:4, July 26, 2012 (R. Oyler). Likewise, the "indigent" exception is no longer helpful to most voters because they generally do not need to pay fees to obtain identification or underlying documentation. *See id*. at 470:20-471:25.

maintenance of reports that would damage the reputations of attorneys listed). As the Supreme Court explained in *Perles*, "either an individual voter or a group of voters are not to be disenfranchised at an election except for *compelling* reasons." 415 Pa. at 159, 202 A.2d at 540 (emphasis added) (internal citation omitted). The disenfranchisement of voters that will occur because of the Photo ID Law is not justified by any "compelling reasons."

The Photo ID Law cannot be justified as a response to actual voter fraud; Respondents have stipulated that there is no evidence of actual fraud that would be prevented by photo identification. *See* Pet'rs' Trial Ex. 15, ¶¶ 1-3. Nor was the Photo ID Law a response to a likelihood of fraud in the November 2012 election; Respondents again stipulated that there was no such likelihood. *See* Pet'rs' Trial Ex. 15, ¶ 5. Respondents have now confirmed that there is no evidence of actual fraud that would have been prevented by the Photo ID Law during the November 2012 or May 2013 elections. *See* Resp'ts' Suppl. Response to Interrogatory No. 24 from Pet'rs' Third Set of Interrogatories, at 2.

Respondents now try to justify the Photo ID Law because such fraud "*might* occur in a *future* election," and the photo identification is a "more effective protective tool. . . than the system in place before the Photo ID Law was enacted." *Id*. at 3. But there is no evidence that the safeguards in the prior elections were insufficient. Hr'g Tr. at 570:6-19, 573:17-574:3 July 27, 2012 (M. Wolosik). And there is ***no*** evidence that the prior safeguards will become ineffective in the future, which renders this justification entirely speculative.

Speculation about what might occur in the future without ***any*** evidence of past problems cannot sustain an election requirement that so burdens the fundamental right to vote that otherwise qualified voters will unavoidably be disenfranchised. For example, in *Cusick's Election*, 136 Pa. at 467, 20 A. at 574 (citing *Page*, 58 Pa. 338), the election regulation was

necessitated by concrete, actual evidence of election problems that the General Assembly was trying to address. The court observed that "[o]ur books are full of [contested election] cases where such fraud has been developed. . . [and] I was fully convinced that the election laws were utterly insufficient in preventing fraud, and subsequent experience has confirmed me in my opinion." 136 Pa. at 467, 20 A. at 574.[21] Likewise, in *De Walt*, the legislature's secret ballot law was intended to ensure that "each voter shall be permitted to cast a free and unintimidated ballot" and the specific regulation was "absolutely necessary" to achieve that goal. 146 Pa. at 540, 543, 24 A. at 186, 187. Here, there is no evidence of actual fraud showing that the prior law was insufficient in any way. And there is certainly no basis to suggest that imposing a requirement that will disenfranchise large numbers of voters is "absolutely necessary" to any legitimate – let alone compelling – goal.

Respondents are left to argue that the Photo ID Law is justified by

> concerns about *public confidence* in the integrity of the election system and that *citizens of the Commonwealth* . . . do not have confidence that the voting system, absent a Photo ID Law, includes adequate measures to reliably assure that those who cast ballots in the Commonwealth's polling places are who they say they are.

Resp'ts Suppl. Response to Interrogatory No. 24 from Pet'rs' Third Set of Interrogatories, at 3. Again, Respondents have presented no actual evidence of a public confidence problem. To the extent such a public confidence problem actually exists, Respondents concede that it is not

[21] To state the obvious, the fraud in contested elections that was of concern in the 1800s is no longer an issue in Pennsylvania and is not the type of fraud against which the Photo ID Law supposed protects -- namely, someone appearing in person at the polls pretending to be someone else, forging the true voter's signature so that it matches the signature on record, and then voting in the true voter's name.

grounded in reality. Respondents' witnesses further concede that disenfranchising voters will ***lower*** the integrity of elections.

But Respondents' argument based on supposed public perceptions is entirely circular and self-serving. Any such public perception flows directly from the advocacy efforts of the Governor, the Secretary of the Commonwealth and other architects of the Photo ID Law to justify a law that they wanted for their own reasons. *See, e.g.,* Pet'rs' Trial Ex. 42 (House Majority Leader Mike Turzai: "[Law is] gonna allow Governor Romney to win the state of Pennsylvania."). The evidence will show that Respondents and the Law's other supporters waged a public campaign to convince the public – contrary to their stipulation and sworn statements in this litigation – that there ***is*** evidence of fraud necessitating a photo identification requirement. *See, e.g.*, Exhibits 7 and 8. Indeed, even as Secretary Aichele's staff on her behalf swears in this litigation that they are aware of no evidence of fraud, she testified under oath as recently as February 25, 2013 before the Pennsylvania Senate that she believed her prior statement that voter fraud existed in Pennsylvania was still correct.[22] Creating a false perception in the public of a problem that does not exist cannot be used to justify a "solution" that infringes on the fundamental right to vote.

II. THE PHOTO ID LAW VIOLATES THE GUARANTEE OF EQUAL PROTECTION UNDER THE PENNSYLVANIA CONSTITUTION.

The Pennsylvania Constitution also guarantees that elections be "free and equal" under Article I, Section 5 and that all laws afford equal protection to Pennsylvania citizens under

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[22] *See* Budget Hearing before the Pa. H. Appropriations Comm. (Feb. 28, 2012) (testimony of Secretary Carol Aichele) http://www.pacapitoldigest.com/newsletter/default.asp?NewsletterArticleID=24792&SubjectID= (link to video and written testimony).

Article I, Section 1 and Section 26. The Supreme Court has already held that the Photo ID Law ***does*** impose burdens on voters who lack identification and that those burdens ***do*** fall most heavily on society's most vulnerable: "the elderly, disabled members of [the] community, and the financially disadvantaged." *Applewhite II*, 54 A.3d at 4. The Department of State's Director of Policy, Rebecca Oyler, now agrees that "it makes logical sense that [certain groups of voters] . . . are more likely than other populations to have difficulty getting IDs."[23] These groups include: "minority populations and non-English speaking populations, socioeconomic groups who may not have access to certain provisions that would . . . allow them to easily get IDs," "elderly populations and disabled populations," and "college students."[24]

As discussed above, we now know that the Departments of State and Aging knew that the Photo ID Law – unless changed – would inevitably disenfranchise (at a minimum) elderly, disabled and ill voters. These voters disproportionately face an unconstitutional choice not faced by other voters. They must choose between their right to vote and the unnecessary and, for many, insurmountable burden of trying to obtain acceptable identification. Imposing extra and unnecessary burdens or limitations on a group of voters based solely on the vagaries of life is analogous to *Mixon v. Commonwealth*, 759 A.2d 442, 451 (Pa. Commw. Ct. 2000), *aff'd per curiam*, 566 Pa. 616, 783 A.2d 763 (2001). In that case, the Court invalidated a law requiring that felons, who had not been registered to vote when incarcerated, must wait five years after their release from prison before registering to vote, finding this to constitute an irrational

[23] Oyler Dep., June 10, 2013, at 28:4-18.

[24] Oyler Dep., June 10, 2013, at 28:4-18.

distinction from those felons who happened to have been lucky enough to have registered to vote prior to incarceration and thus could vote immediately upon release. *Id.*[25]

Here, voters who happen to have had an ID when the Photo ID Law was passed are generally not burdened, but those who lacked identification face new and unnecessary burdens unrelated to their eligibility to vote. In the Respondents' own words, such voters will be disenfranchised due to "happenstance beyond the control of the elector."[26] There is no rational, important or compelling justification for drawing such distinctions among voters. As such, the Photo ID Law violates the unequal prong of the "Free and Equal" guarantee in the Pennsylvania Constitution. And because the Law admittedly has a greater impact on minorities, non-English speakers, and the elderly (among others) than on other groups, it denies equal protection in violation of Article I, Section 1 and Section 26.

III. THE PHOTO IDENTIFICATION REQUIREMENT SHOULD BE PERMANENTLY ENJOINED.

A. The Court Should Declare the Photo ID Law Facially Unconstitutional and Permanently Enjoin Enforcement of the Photo ID Requirement.

Pursuant to Pennsylvania Rule of Civil Procedure 1531, Petitioners are entitled to a permanent injunction against the enforcement of the in-person photo identification requirement because that requirement is facially unconstitutional. For the reasons discussed above, Petitioners will establish that (1) the right to relief is clear, (2) the injunction is necessary to

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[25] The *Mixon* court also held, citing a long line of authority restricting the vote for convicted felons, that "the right of ***felons*** to vote is not a fundamental right." *Mixon*, 759 A.2d at 451 (emphasis added). That reasoning is not applicable here, however, as the Photo ID Law does not disenfranchise individuals on the basis of felony status and the Supreme Court has now clearly held that the right to vote ***is*** a fundamental right. *Applewhite II*, 54 A.3d at 3.

[26] *See* Memorandum from Offices of Policy and Legislative Affairs, Departments of Aging and State, to Office of Governor, Nov. 29, 2011, at 4 (Pet. Trial Ex. 1562).

avoid an injury that cannot be compensated by damages, and (3) greater injury will result if the court does not grant the injunction than if it does. *Doe v. Zappala*, 987 A.2d 190, 193 n.2 (Pa. Commw. Ct. 2009).

Here, the right to relief is clear because, *inter alia*, Respondents themselves recognize that they cannot forestall the possibility of disenfranchisement based on how the law is written. For voters who will be disenfranchised, there are no "do overs" in elections and no way for money damages to compensate for the loss of the right to vote. And the injury to voters (as well as the integrity of elections) from disenfranchisement far outweighs the complete lack of any harm if the law is not enforced. Accordingly, Petitioners are entitled to a permanent injunction.

B. In the Alternative, the Court Has Tools to Enjoin the Photo ID Requirement on More Limited Grounds.

Facial invalidation of the Photo ID Law is required by the express protections for voting in the Pennsylvania Constitution. If *arguendo* the Court declines to do so, the Court nonetheless has several alternative tools to prevent the disenfranchisement that will result if the Law is enforced: (1) issue an as-applied injunction, (2) issue an injunction on purely statutory grounds, and (3) issue an injunction until such time as there will be no disenfranchisement.

(i) The Court May Find the Photo Identification Requirement Unconstitutional As Applied and Enter an As-Applied Injunction.

Pennsylvania courts have long recognized the importance of enjoining unconstitutional applications of state statutes. *See, e.g.*, *Pa. R.R. Co. v. Philadelphia Cnty.*, 222 Pa. 100, 112-13, 68 A. 676, 678 (1908) (finding a state statute unconstitutional as-applied and upholding an injunction preventing the statutory rate regulations from being applied to the plaintiff); *Johnson v. Allegheny Intermediate Unit*, 59 A.3d 10, 22-23 (Pa. Commw. Ct. 2012) (granting a permanent injunction to the plaintiff after holding that a prohibition against certain types of

employment by those convicted of specified crimes was unconstitutional as-applied to the plaintiff).

In crafting the scope of an "as-applied" declaratory judgment and resulting "as-applied" injunction, the Court can and should extend the remedy to a broader group of individuals than just the named Petitioners before the Court. For example, in *Tennessee v. Garner*, 471 U.S. 1 (1985), the U.S. Supreme Court declared unconstitutional a state statute allowing the use of deadly force against any felony suspect likely to escape, as applied to the plaintiff, an unarmed minor who was shot and killed while fleeing the scene of a burglary. Even though this constitutional determination was made in the context of the plaintiff's individual § 1983 suit seeking monetary damages for harm caused by a specific incident, the Court declared the law unconstitutional as to all similarly situated persons "insofar as [the law] authorizes the use of deadly force against [unarmed, nondangerous] fleeing suspects." *Id*. at 11.

Likewise, the Pennsylvania Supreme Court struck down a statewide tax assessment statute as unconstitutional as applied to the four individual plaintiffs and then granted broad prospective relief in the form of a requirement that Allegheny County conduct a county-wide reassessment of all properties rather than limiting any remedy to the named plaintiffs. *Clifton,* 600 Pa. at 705-06, 969 A.2d at 1223-24.[27]

Here, an "as-applied" declaratory judgment and injunction would prohibit the enforcement of the photo identification requirement for in-person voters who lack identification.

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[27] Even in *League of Women Voters of Indiana, Inc. v. Rokita*, 929 N.E.2d 758, 767 (Ind. 2010), where the Indiana court rejected a facial challenge, it warned that the results would be different in an as-applied challenge "if a claim were presented and proven that reasonable government assistance was not actually available to adequately relieve either the cost or hardship of obtaining photo ID." *Id.* at 769. In Pennsylvania, the evidence is overwhelming that there is no reasonable government assistance to relieve the cost and burdens of obtaining a photo ID.

Petitioners respectfully submit that it is not wise to create a system in which some voters are required to show identification if they have it, but other voters are permitted to vote even if they do not. *See, e.g.*, *Dunn*, 405 U.S. at 335 n.2, 345 (striking down on facial grounds voting law that affected only 3-5% of voters). That system would have no benefit and only cause confusion. Moreover, it would cross the line from judging into legislating. *See supra* at 16 n.13. But, between permitting the Law to be enforced against all voters (and thus disenfranchising many) and creating some confusion in regard to who needs identification, Petitioners submit that an "as-applied" declaratory judgment and injunction is the less harmful option if the Court does not issue a facial injunction.

(ii) The Court Can Enjoin the Enforcement of the Photo Identification Requirement on Purely Statutory Grounds.

The Court can also enjoin the photo identification requirement without reaching the constitutional questions. Here, it is beyond dispute that Respondents have not implemented the "critical terms of the statute" set forth in Section 2626(b) and Section 2626(c) through which the General Assembly sought to ease (but could not eliminate) the burdens on voters who lacked identification. *See Applewhite II*, 54 A.3d at 3-4, 5. By failing to implement the statute in a way that "comport[s] with the requirement of liberal access which the General Assembly attached to the issuance of the PennDOT identification cards, . . . the court is obliged to enter [an] . . . injunction." *Id*. at 5.[28] Allowing the photo identification requirement to be enforced "would mutilate the [Law] and would be contrary to the intent of the General Assembly." *Indianapolis Power & Light Co. v. Pa. Pub. Util. Comm'n*, 711 A.2d 1071, 1087 (Pa. Commw. Ct. 1998).

[28] As discussed above, Respondents now concede that "[i]f proof of identification is not liberally available to registered electors . . . , the Voter ID Law cannot be administered as required by the statute itself, or consistently with constitutional requirements." Resp'ts' Discovery Resp. at 11.

The evidence at prior hearings has shown that Respondents implemented the Photo ID Law in a way that affirmatively undermined the General Assembly's minimal promise of a free PennDOT identification to voters in Section 2626(b) and thereby increased the likelihood of disenfranchisement. Evidence at the upcoming trial will further show that Respondents virtually ignored the General Assembly's mandate that they tell the public about available identification, rendering useless even the minimal promise of identification.

a. Respondents' Initial Implementation Efforts Increased the Likelihood of Disenfranchisement.

The Supreme Court politely described the Respondents' "implementation process" as "by no means . . . seamless in light of the serious operational constraints faced by the executive branch." *Applewhite II*, 54 A.3d at 5. The Supreme Court recognized that Respondents purposefully disregarded a "critical" statutory mandate and instead imposed unlawful hurdles on voters trying to obtain the free PennDOT card promised by the General Assembly. *Id*. at 3-4, 5. Even the DOS ID card was not implemented consistent with the required liberal access from the time it was launched until the morning of the remand hearing. *Id*. at 4; *Applewhite III*, 2012 WL 4497211, at *2; Resp'ts' Discovery Resp. at 13 (Department of State only "liberalized the policies and procedures applicable to the DOS ID program to assure compliance with the statute" after *Applewhite II*.).

As a result, untold numbers of voters ***tried*** to get ID from PennDOT and were wrongfully turned away, including many of the witnesses from whom the Court has already heard. Respondents have done ***nothing*** to try to reach those voters in the nine months since they supposedly started providing liberal access, and they have no plans to do so. These admissions alone demonstrate that there is no reason to believe that the Law can ever be implemented in a

manner that will forestall the possibility of disenfranchisement of voters who ***tried*** to comply with the Law but were wrongfully turned away.

b. Respondents Have Failed to Comply with their Statutory Obligations to Educate Voters.

The Supreme Court determined that an injunction was required because Respondents had ignored the requirement to make PennDOT identification liberally available under Section 2626(b). The Supreme Court did not suggest that compliance with Section 2626(b) alone would allow the Law to pass constitutional muster in the short or long term. To the contrary, the Court recognized that, at a minimum, it would be a combination of liberally available identification and "efforts to educate the voting public" that ***might*** "ultimately be sufficient to forestall the possibility of disenfranchisement." *Applewhite II*, 54 A.3d at 4. The General Assembly required two forms of voter education: (1) education about the new photo ID requirement under Section 2626(a), and (2) education about available identification under Section 2626(c). Respondents have failed to implement either section adequately.

The evidence shows that prior to the November 2012 election, Respondents focused virtually all of their efforts on 2626(a) to tell people they cannot vote without identification. But Respondents did not comply with the assurances they offered the Court in the past about their educational efforts. We now know that no postcard about the Photo ID Law was mailed in Spanish, as was originally promised.[29] We now know that Respondents did not do a "crawl" across the bottom of the lottery drawing, which Secretary Aichele testified in July 2012 would be

[29] Hr'g Tr. at 823:5-11, July 30, 2012 (J. Marks); Hr'g Tr. at 151:22-24, Sept. 25, 2012 (S. Royer).

particularly effective.[30] And they cancelled the two rounds of robocalls that they promised to the Court.[31] Since the November 2012 election, Respondents have stopped all of their widespread educational efforts despite the statute imposing no time limit on their educational obligations.

Even worse, Respondents completely ignored their obligations under 2626(c):

> The Secretary of the Commonwealth, the Secretary of Transportation and the county boards of election shall disseminate information to the public regarding the availability of identification cards under subsection (b).

This provision reflects the common sense judgment that making a free identification theoretically available will not prevent disenfranchisement if the voting public is not informed that such cards are liberally available.

The evidence will show that in the sixteen months since Act 18 became law, Respondents have not run a single TV, radio, print, billboard, internet, or robocall advertisement telling voters that they could obtain an identification – either a PennDOT card or a DOS ID card – for voting from PennDOT even if PennDOT had turned them down in the past. Far from "disseminating information to the public" about identification to which voters are statutorily entitled, Respondents sent a postcard to 5.9 million households in September 2012 that ***misinformed*** voters about how to get identification and ***discouraged*** voters who had been rejected by PennDOT in the past from trying again. Specifically, this postcard told voters that free ID was available from PennDOT only with "supporting documentation" – in contravention of Section 2626(b)'s elimination of the normal supporting documentation requirements for a PennDOT ID.

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[30] Hr'g Tr. at 1021:21-1022:3, July 31, 2012.

[31] Hr'g Tr. at 517:5-6, July 27, 2012 (S. Royer).

Even the handout at the polls failed to tell voters that they could get a DOS ID without supporting documentation even if the voter was turned away by PennDOT in the past.

The Supreme Court has already held that failure to implement the "critical terms of the statute" that the General Assembly included as a partial easing of the burdens on voters renders the Law constitutionally infirm. *See Applewhite II*, 54 A.3d at 5. Respondents now concede that their failure to make ID liberally available means that the "the Voter ID Law cannot be administered as required by the statute itself, or consistently with constitutional requirements." Resp'ts' Discovery Resp. at 11. The same reasoning applies to the statutory mandate under Section 2626(c) to tell the voting public about the availability of identification for voting.

(iii) The Court Can Also Enjoin Enforcement of the Photo Identification Requirement Until Respondents Demonstrate that There Will Be No Disenfranchisement from the Enforcement of the Law.

The Pennsylvania Supreme Court made clear that an injunction cannot be denied based on "a mere predictive judgment" that the Respondents' actions "will ultimately be sufficient to forestall the possibility of disenfranchisement." *Applewhite II*, 54 A.3d at 4-5. After sixteen months, there will be no basis to believe that Respondents will ever be able to enforce the photo identification requirement without disenfranchising otherwise qualified voters. Therefore, there is no reason to do anything other than declare the Law unconstitutional and enjoin the enforcement of the photo identification requirement.

Petitioners anticipate that the Respondents will offer assurances that if the photo identification requirement is enforced, they will find a way to comply with the statutory requirements, that sufficient identification will be issued, and that voters will somehow not be disenfranchised. If Respondents believed they needed more time to implement the Photo ID Law to avoid disenfranchisement, they should have joined in Petitioners' request to defer the trial. Respondents instead insisted that they were prepared to have their implementation efforts

judged in July 2013. The Court therefore should not consider any suggestions of possible future actions in assessing the constitutionality of the Photo ID Law.

That said, if the Court believes that the Respondents may at some point in the future find a way to implement the Law without disenfranchising voters, Respondents will be able to apply in the future to modify or lift an injunction upon showing that the Law can now be enforced with no disenfranchisement. *See, e.g.*, Pa. R.C.P. 1531; *Ladner v. Siegel*, 298 Pa. 487, 496, 148 A. 699, 702 (1930) (noting that the court which grants a permanent injunction "possesses the undoubted power to either vacate or modify, when the circumstances and situation of the parties have so changed as to render such action just and equitable"). As such, the remote possibility of future constitutional implementation is not a basis to deny a permanent injunction now.

IV. THE PRELIMINARY INJUNCTION SHOULD BE EXTENDED TO COVER ALL FUTURE ELECTIONS UNTIL A FINAL DECISION ON THE MERITS BY THE SUPREME COURT.

Petitioners hereby move this Court to extend the preliminary injunction that expired after the May 21, 2013 election. In the interests of judicial efficiency, the Court should follow the normal practice and extend the preliminary injunction until such time as a final decision is reached on the permanent injunction by the Supreme Court. If the preliminary injunction is not extended, hundreds of thousands of registered Pennsylvania voters will face disenfranchisement in upcoming elections and the Court will face repeated applications for a preliminary injunction before each election. In accordance with the Court's Scheduling Order, Petitioners will submit a post-trial brief to more fully address why the preliminary injunction should be extended. But, in sum, the preliminary injunction should be extended because nothing has changed since it was originally entered and the risk of disenfranchisement remains the same absent preliminary relief.

In October 2012, this Court was "not still convinced in [its] predictive judgment that there [would] be no voter disenfranchisement arising out of the Commonwealth's

implementation of a voter identification requirement for purposes of the upcoming election." *Applewhite III*, 2012 WL 4497211, at *5. In particular, the Court noted that it had previously estimated that "the percentage of registered voters who did not have photo ID as of June, 2012, is somewhat more than 1% and significantly less than 9%." *Id.* (citing *Applewhite I*, 2012 WL 3332376, at *3 n.16). Every one percentage point equaled about 82,000 voters. Based on this estimate and the number of DOS IDs and PennDOT IDs for voting purposes that had been issued, the Court found that "the gap between the photo IDs issued and the estimated need [would] not be closed" before the November 2012 general election. *Id.*

As shown above, nothing material has changed and the gap between voters and identification remains unconstitutionally large by any measure. Since the November election, the issuance of voter identification has slowed to a trickle. Voter education has effectively ended. Respondents requested ***no*** money for voter education under Section 2626(a) or Section 2626(c) in the Governor's February 2013 proposed budget for the next fiscal year, and they have spent no money on voter outreach since the November 2012 election. There has simply been no change to justify ***refusing*** to extend the preliminary injunction until a decision on the merits.

As the Court noted in its October 2, 2012 Order, a preliminary injunction normally will remain in place until a decision is reached on a permanent injunction. *See* 2012 WL 4497211, at *3; *see also e.g., Greater Nanticoke Area Educ. Ass'n v. Greater Nanticoke Area Sch. Dist.*, 938 A.2d 1177, 1185-86 (Pa. Commw. Ct. 2007) (Simpson, J.) (affirming the entry of a preliminary injunction and noting that a "factual issue invite[d] maintenance of the status quo until a full hearing [could] be held"); *Berger v. W. Jefferson Hill Sch. Dist.*, 669 A.2d 1084, 1085 (Pa. Commw. Ct. 1995) (the "primary purposes of a preliminary injunction are to preserve the status quo and prevent imminent and irreparable harm which occur before the merits of the case can be

heard and determined"); *In re Appeal of Little Britain Twp.*, 651 A.2d 606, 611 (Pa. Commw. Ct. 1994) (the "sole object of a preliminary injunction is to preserve the subject of the controversy in the condition in which it is when the order is made . . . to maintain the existing status until the merits of the controversy can be fully heard and determined"). There is no reason to depart from that normal practice here while this case makes its way through trial, post-trial findings of fact, an *en banc* Commonwealth Court hearing and decision, and finally an appeal to the Pennsylvania Supreme Court.

Finally, Petitioners respectfully submit that henceforth the preliminary injunction should no longer permit election workers to ask for identification even though it is not required. Experience has shown that this continued "soft rollout" serves only to confuse poll workers and voters. For example, evidence from voter integrity hotlines and media reports show that during the November 6, 2012 election, signs posted at some polls contained inaccurate information about photo ID requirements and poll workers were telling voters that they were required to provide ID in order to vote.[32] The misinformation spread by the Commonwealth's advertising campaign and confusion at the polls only heightens the risk that voters without valid ID will stay away from the polls or be inadvertently disenfranchised. In order to prevent this inadvertent disenfranchisement and protect the integrity of Pennsylvania elections, the scope of the preliminary injunction should be expanded to bar enforcement of all sections of the Photo ID Law related to in-person voting until a decision on the merits.

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[32] *See, e.g.*, Jessica Parks, *Pa.'s new voter ID law causes confusion, voters say*, Phila. Inquirer, Nov. 7, 2012, *available at* http://www.philly.com/philly/news/homepage/20121107_Pa__voter_ID_law_confuses.html.

CONCLUSION

For the reasons herein, as well as those presented at the past hearings and those to be presented at the upcoming trial, the in-person photo identification requirements of Act 18 should be declared unconstitutional and their enforcement be permanently enjoined. Pending a final decision on the merits by the Supreme Court, the preliminary injunction should be extended and modified to enjoin both requesting and requiring photo identification to vote in person.

Dated: June 17, 2013

Respectfully submitted,

David P. Gersch
Michael Rubin
Whitney Moore
Dorian Hurley
Dana Peterson
Rachel Frankel
ARNOLD & PORTER LLP
555 Twelfth Street, NW
Washington, DC 20004-1206
Telephone: +1 202.942.5000
Facsimile: +1 202.942.5999
David.Gersch@aporter.com

Attorneys for Petitioners

Witold J. Walczak
Attorney ID No. 62976
ACLU of Pennsylvania
313 Atwood Street
Pittsburgh, PA 15213
Telephone: 412.681.7736
Facsimile: 412.681.8707
vwalczak@aclupa.org

Jennifer R. Clarke
Attorney ID No. 49836
Benjamin D. Geffen
Attorney ID No. 310134
Public Interest Law Center of Philadelphia
1709 Benjamin Franklin Parkway, 2nd Floor
Philadelphia PA 19103
Telephone: +1 215.627.7100
Facsimile: +1 215.627.3183

Marian K. Schneider
Attorney I.D. No. 50337
Advancement Project
295 E. Swedesford Road # 348
Wayne, PA 19087
Telephone: +1 610.644.1925
Facsimile: +1 610.722.0581

Penda Hair
Advancement Project
1220 L Street, NW, Suite 850
Washington, DC 20005
Telephone: +1 202.728.9557
Facsimile: +1 202.728.9558

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

Viviette Applewhite; Wilola Shinholster Lee; Gloria Cuttino; Nadine Marsh; Bea Bookler; Joyce Block; 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 day of June 17, 2013, serving the foregoing Petitioners' Petitioners' Pre-Trial Statement And Application For Special Relief In The Nature Of Preliminary and Permanent Injunctions, upon the persons and in the manner indicated below, which service satisfies the requirement of Pa. R.A.P. 121:

Service by email per agreement with Respondents' Counsel as follows:

Timothy Keating, Esq.
tkeating@attorneygeneral.gov
Senior Deputy Attorney General
Office of Attorney General
Civil Litigation Section
15th Floor, Strawberry Square
Harrisburg, PA 17120

Kevin P. Schmidt, Esq.
kevschmidt@pa.gov
Deputy General Counsel
Governor's Office of General Counsel
17th Floor, 333 Market Street
Harrisburg, PA 17101

Dated: June 17, 2013

Dorian Hurley

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

Viviette Applewhite; Wilola Shinholster Lee; Gloria Cuttino; Nadine Marsh; Bea Bookler; Joyce Block; 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

PROPOSED ORDER

AND NOW, this _____ day of _____, 2013, upon consideration of the evidence, arguing and briefing on Petitioners' Application for Special Relief in the Nature of a Preliminary and Permanent Injunction, it is hereby **ORDERED** that said Application for Special Relief in the Nature of a Permanent Injunction is **GRANTED**. The Respondents are **PERMANENTLY ENJOINED** from implementing, enforcing, or taking any steps to implement or enforce Act 18's photo identification requirements for in-person voters, including, but not limited to the following:

1. Respondents shall not enforce Act 18's requirement that all registered voters show photo identification as a condition of voting in person in any election; and

2. Respondents shall withdraw, remove and otherwise cease any further public education/publicity campaign, including website pages, aimed at telling voters that they need a photo identification in order to vote in any election.

This Order does not affect the absentee ballot provisions of Act 18. This Order also does not affect any of the provisions of the Election Code that were in effect prior to the enactment of Act 18.

IT IS SO ORDERED

BY THE COURT

_____

Hon. Robert Simpson, Judge

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

Viviette Applewhite; Wilola Shinholster Lee; Gloria Cuttino; Nadine Marsh; Bea Bookler; Joyce Block; 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

PROPOSED ORDER

AND NOW, this _____ day of _____, 2013, upon consideration of the evidence, arguing and briefing on Petitioners' Application for Special Relief in the Nature of a Preliminary and Permanent Injunction, it is hereby **ORDERED** that said Application for Special Relief in the Nature of a Preliminary Injunction is **GRANTED**. Until further order of this Court or a decision on the merits by the Pennsylvania Supreme Court, the Respondents are **ENJOINED** from implementing, enforcing, or taking any steps to implement or enforce Act 18's photo identification requirements for in-person voters, including, but not limited to the following:

1. Respondents shall not enforce Act 18's requirement that all registered voters show photo identification as a condition of voting in person in any election;

2. Respondents shall withdraw, remove and otherwise cease any further public education/publicity campaign, including website pages, aimed at telling voters that they need a photo identification in order to vote in any election; and

3. Respondents and election workers shall no longer be permitted to ask but not require photo identification as part of a "soft roll out" of the photo identification requirements in Act 18.

This Order does not affect the absentee ballot provisions of Act 18. This Order also does not affect any of the provisions of the Election Code that were in effect prior to the enactment of Act 18.

IT IS SO ORDERED

BY THE COURT

_____

Hon. Robert Simpson, Judge

Applewhite, et al. v. Commonwealth of Pennsylvania, et al.
No. 330 MD 2012

EXHIBIT 1

Petitioners' Pre-Trial Statement And Application For Special Relief In The Nature Of A Preliminary Injunction

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

Viviette Applewhite; Wilola Shinholster Lee; Gloria Cuttino; Nadine Marsh; Bea Bookler; Joyce Block; 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

PETITIONERS' PARTIAL SUMMARY OF THE PRIOR EVIDENTIARY RECORD

I. PENNSYLVANIA'S PHOTO ID LAW

A. Requirements of the Law.

The Act of March 14, 2012, P.L. 195, No. 18 (the "Photo ID Law" or the "Law") affected a significant change in voting requirements in Pennsylvania by requiring for the first time, with minor exceptions, that all in-person voters provide one of a few specified forms of photo identification ("ID").[1] Hr'g Tr. 769:11-13, July 30, 2012 (J. Marks). The Photo ID Law requires Pennsylvanians who appear to vote in-person to produce specific types of photo ID that must be

[1] Before the Photo ID Law, first-time voters established their identity by either photo or non-photo ID, including bank statements and utility bills. *See* 25 P.S. § 1210(a.1) (amended 2012). All voters were required to sign in at the polls, and poll workers compared each voter's signature to the signature in the district register on file with the county voter registration office. 25 P.S. § 3050(a.3) (amended 2012). *See also* Hr'g Tr. 569:6-570:16, July 27, 2012 (M. Wolosik).

issued by only one of the following: (1) the U.S. Government, (2) the Commonwealth of Pennsylvania, (3) a municipality of Pennsylvania to an employee of that municipality, (4) an accredited Pennsylvania public or private institution of higher learning, or (5) a Pennsylvania care facility. 25 P.S. § 2602(z.5)(2)(iv). The photo ID must show a name that "substantially conforms" to the name of the voter as it appears in voter registration records. *Id.* § 2602(z.5)(2)(i). The ID must also contain an expiration date and, in most instances, it must not have expired. *Id.* § 2602(z.5)(2)(iii).[2]

A limited group of voters can avoid the requirement to show photo ID by voting absentee if they otherwise meet the prerequisites to do so.[3] To cast an absentee ballot, registered voters must provide either a current and valid driver's license number or the last four digits of their Social Security number; no other proof of identification is required. *Id.* § 2602(z.5)(3)(i), (ii).

If a voter has no acceptable photo ID at the polling place, the Photo ID Law provides that the voter may submit a provisional ballot. *Id.* § 3050(a.2)(1); Hr'g Tr. at 576:19-24, July 27, 2012 (M. Wolosik). That ballot will not be counted at the time of voting. Hr'g Tr. at 576:17-20, July 27, 2012 (M. Wolosik). Instead, the voter has six calendar days to submit to his county board of elections either (1) an acceptable photo ID required by the Law or (2) an affirmation

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[2] A Pennsylvania Department of Transportation ID card that is not more than twelve months past its expiration date is acceptable under the Photo ID Law, as is ID from an agency of the Armed Forces of the United States or reserve component that establishes that an individual is a current member or veteran of the Armed Forces or National Guard and that includes a designation that the expiration date is indefinite. 25 P.S. § 2602(z.5)(2)(iii)(A), (B).

[3] Unlike some other states, Pennsylvania does not permit voting absentee unless the voter is actually absentee from the municipality for military service, business or illness. *Id.* § 2602(w), 3146.1. Further, a voter who is unable to attend his or her polling place on the day of any election because of illness or physical disability must apply for an absentee ballot by executing a statement declaring the nature of his or her illness or disability, and the name, office address, office telephone number of his or her attending physician. *Id.* § 3146.2(e)(2).

that the voter (a) is indigent and (b) cannot obtain proof of identification without payment of a fee.[4] *Id.* § 3050(a.4)(5)(ii)(D), (E); Hr'g Tr. at 589:15-17, July 27, 2012 (M. Wolosik). Provisional ballots cast by voters who lacked photo ID at the polls also are subject to all of the pre-existing procedures governing provisional ballots, including that the ballot may be challenged and, as a result, may not be counted. *Id.* § 3050(a.4)(5)(i), (ii); Hr'g Tr. at 577:21-581:14, July 27, 2012 (M. Wolosik). In the event of a challenge to a provisional ballot, notice is given to the voter only "where possible." *Id.* § 3050(a.4)(4)(i). Regardless, the provisional ballot option will only help those who left their ID at home. Hr'g Tr. at 468:23-489:4, July 26, 2012 (R. Oyler).

The Pennsylvania Department of Transportation ("PennDOT") is required to issue its non-drivers ID card at no cost to any registered elector who completes an application and affirms that he does not have acceptable ID under the Photo ID Law and needs the ID for voting purposes. *Id.* § 2626(b). The Photo ID Law also requires that the Secretary of the Commonwealth "prepare and disseminate information to the public" regarding the requirements of the Photo ID Law. *Id.* § 2626(a). The Law also requires the Secretary of the Commonwealth, among others, to disseminate information to the public regarding the availability of free PennDOT identification cards. *Id.* § 2626(c).

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[4] Respondents have conceded that, because the Pennsylvania Department of State intended to make it possible for Pennsylvania-born residents to obtain a free birth certificate and there is no fee for a Pennsylvania Department of Transportation ID card for voting, Pennsylvania-born voters generally could not sign the indigence affidavit. Hr'g Tr. at 470:20-471:25, July 26, 2012 (R. Oyler).

B. A Substantial Number of Voters Lack Acceptable ID Under the Photo ID Law

During the July and September 2012 hearings, Petitioners put forth substantial evidence establishing that many Pennsylvanians do not have any ID that would comply with the Photo ID Law. Commonwealth witnesses testified that the "universal ID" under the Law -- the one form of ID that, in theory, all eligible voters are supposed to be able to obtain -- is the PennDOT non-driver identification card. Hr'g Tr. at 770:24-771:5, July 30, 2012 (J. Marks); Hr'g Tr. at 1012:11-13, July 31, 2012 (C. Aichele). However, Respondents conceded that, because of security concerns, they could not ensure that every eligible voter would be able to receive a PennDOT ID -- a fact known to Respondents before the Law was adopted. Hr'g Tr. at 698:4-699:5, July 27, 2012 (K. Myers); Pet'rs' Ex. 20 (Email from K. Kotula to S. Royer et al. (June 12, 2012) (identifying various groups that "may not be able to obtain the free non-driver's license photo ID from [PennDOT]"). Specifically, PennDOT vets all applicants for PennDOT IDs through a "rigorous" identification process, requiring a raised seal birth certificate (or its equivalent), a social security card, and two forms of documentation showing current residence. Hr'g Tr. at 689:11-690:15, July 27, 2012 (K. Myers); Pet'rs' Ex. 19. PennDOT believes it must maintain the rigorous standards to comply with various federal and state concerns following 9/11. Hr'g Tr. at 728:14-729:14, July 27, 2012 (K. Myers). Consequently, PennDOT has been rejecting people for years because they do not have this required underlying documentation to obtain a PennDOT ID. Hr'g Tr. at 698:16-699:5l, 713:12-15, July 27, 2012 (K. Myers).

As a result, many registered and eligible voters do not have PennDOT ID or any alternative form of ID permissible for voting under the Photo ID Law. During the July 2012 hearing, this Court heard various testimony regarding the numbers of persons lacking photo ID, and all of the numbers cited were substantial. In June 2012, the Commonwealth found that for

over 1.4 million then-registered voters it could not locate a PennDOT ID that would be valid for voting in the November 6, 2012 election.[5] Hr'g Tr. at 899:4-900:13; 910:9-911:5, July 30, 2012 (D. Burgess). In addition, Petitioners presented an independent political scientist and survey expert, Professor Matt Barreto, who conducted a survey of over 2300 eligible voters. Hr'g Tr. at 304:19-21, July 26, 2012 (M. Barreto). Professor Barreto testified that over 1 million registered voters and over 1.3 million eligible voters lack PennDOT or any other form of acceptable ID under the Photo ID Law.[6] Hr'g Tr. at 343:24-346:6, July 26, 2012; *see also* Pet'rs' Ex. 18 at 36. Excluding those voters for whom the name on otherwise acceptable ID did not exactly conform to the voting roles, Professor Barreto found that 8.7% of registered voters, or about 717,207 persons, lacked acceptable ID. Pet'rs' Ex. 18 at 37, 38. The Pennsylvania Department of State ("DOS") Director of Policy, Rebecca Oyler, also conducted a back of the envelope estimate of those who lacked ID and estimated that at least 1% lacked identification -- almost 100,000 voters. Hr'g Tr. at 480:7-481:4, 484:22-485:10, July 26, 2012.

After the July 2012 preliminary injunction hearing, this Court estimated that "somewhat more than 1% and significantly less than 9% of registered voters did not have photo ID as of

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[5] The more than 1.4 million registered voters to whom the Department of State and PennDOT were unable to match a PennDOT number for an ID that would be valid for voting in November 2012 consist of 758,939 voters publicly disclosed by Department of State as not matching between the Statewide Uniform Registry of Electors ("SURE") database and PennDOT database, 130,189 in the SURE database with PennDOT ID numbers not matched in the PennDOT database that were not publicly disclosed, and 574,630 voters who matched in the database but whose PennDOT ID expired on October 1, 2011 or earlier and therefore would not be valid ID to vote in the November 2012 election. Hr'g Tr. at 775:18-776:2, July 30, 2012 (J. Marks); Hr'g Tr. 910:6-911:5, 931:3-932:15, July 30, 2012 (D. Burgess).

[6] Professor Barreto survey also showed that, among voters without valid photo ID, 27.6%, or 366,123 people, do not have the underlying documentation to obtain a PennDOT ID. Pet'rs' Ex. 18 at 39.

June, 2012." *Applewhite v. Commonwealth*, No. 330 M.D. 2012, 2012 WL 3332376, at *3 n. 16 (Pa. Cmwlth. Aug. 15, 2012). Applied to an estimated 8.2 million registered voters, Hr'g Tr. at 906:11-907:1, July 30, 2012 (D. Burgess), the Court's estimate is between "somewhat more than" 82,000 and "significantly less than" 738,000. There is no study or other evidence in the record that the number of registered voters or eligible voters without ID necessary to vote under the Photo ID Law is insubstantial or limited to the number of persons testifying.

By September 2012, however, the evidence established that, since the adoption of the Photo ID Law, the Commonwealth had not provided a sufficient number of IDs to prevent the disenfranchisement of many tens, if not hundreds, of thousands of registered voters. At the close of the September 2012 remand hearing, the Commonwealth succeeded in issuing only approximately 9,300 free secure PennDOT identification cards. Hr'g Tr. at 66:9-10, Sept. 25, 2012 (J. Marks). And the Commonwealth had issued fewer than 1,300 DOS IDs for voting purposes. Hr'g Tr. at 156:23-157:2, Sept. 25, 2012 (J. Marks) ("I think it's closer to 1300 by now.").

Further, the record illustrates that only very few voters who lack PennDOT or DOS ID have other acceptable ID. While the Photo ID Law provides for a limited number of other acceptable photo IDs, most are not available to the vast majority of Pennsylvania voters. Hr'g Tr. at 771:6-25, July 30, 2012 (J. Marks). For example, although a college ID is acceptable under the Law, provided it has an expiration date, most eligible voters are not college students. 25 P.S. § 2602(z.5)(2)(iv)(D); Hr'g Tr. at 771:18-23, July 30, 2012 (J. Marks). Likewise, military ID and state employee ID are acceptable if they have an expiration date, but most people are neither state employees nor in the military. 25 P.S. § 2602(z.5)(2)(iv)(D); Hr'g Tr. at 771:10-27, July 30, 2012 (J. Marks). The Law further limits acceptable photo identifications to

those that include an expiration date and that are current. The only exceptions are for (1) a Pennsylvania driver's license or PennDOT photo ID that is not more than 12 months past the expiration date, or (2) an active duty or reserve U.S. Armed Forces or National Guard ID that designates the expiration date as indefinite. *See id.* § 102(z.5)(2)(iii). This expiration date requirement has the practical effect of disenfranchising many voters with an otherwise valid ID issued by a Pennsylvania institution of higher learning, the U.S. Armed Forces, the Veterans Administration, a place of employment, or a nursing home, because those IDs frequently lack expiration dates, and veteran's IDs do not state on their face that the expiration date is indefinite. Hr'g Tr. at 986:10-16, July 31, 2012 (C. Aichele) ("[W]e found that fewer colleges in Pennsylvania used expiration dates than we expected. In fact, a small percentage used expiration dates"); Hr'g Tr. at 772:3-6, July 30, 2012 (J. Marks) (agreeing that "not all colleges are going to put [expiration date] stickers on their cards"); Hr'g Tr. at 988:10-989:3, July 31, 2012 (C. Aichele) ("a lot of [employee ID cards] will not have expiration dates"); Hr'g Tr. at 860:11:16, July 30, 2012 (D. Rosa) (explaining his veterans ID card does not have an expiration date).

Consequently, Professor Barreto's survey found that only 0.6% of registered voters, or about 49,462 persons, without PennDOT ID had some other form of acceptable ID for voting. Hr'g Tr. at 356:11-17, July 26, 2012 (M. Barreto); Pet'rs' Ex. 18 at 37. Further, Professor Barreto's survey found that 12.1% of registered voters erroneously believed they had acceptable photo ID when they did not. Hr'g Tr. at 389:14-391:17, July 26, 2012 (M. Barreto); Pet'rs' Ex. 18 at 36. However, the record does not evince any plan by the Commonwealth to issue the number of IDs necessary, by its own estimates, to forestall the possibility of disenfranchisement. Hr'g Tr. at 238:11-240:20, Sept. 25, 2012 (J. Marks); Hr'g Tr. at 152:11-153:11, Sept. 25, 2012 (S. Royer). Accordingly, the gap between the photo IDs issued and the estimated need was

significant at the close of evidence of the September 2012 hearing; many thousands of otherwise qualified voters still did not have acceptable photo identification and will be disenfranchised in future elections if the Photo ID Law is permitted to go into effect. There is no evidence in the record to the contrary.

C. Burdens to Voting Imposed by the Law

This Court heard testimony from voter after voter who, despite best efforts and expending significant money and/or resources, could not qualify for a PennDOT ID or otherwise faced unreasonable burdens in obtaining acceptable ID. For each of the individual witness who would be disenfranchised or whose right to vote would be burdened by the Photo ID Law, there are countless other Pennsylvanians like them who will lose the right to vote should the Photo ID Law go into effect.

First, many voters face significant burdens in acquiring the documentation necessary to obtain a PennDOT ID. For example, Viviette Applewhite is a registered voter born in 1919 in Philadelphia who has missed just one presidential election since she began voting. Hr'g Tr. at 95:8-13, 100:15-101:12, July 25, 2012. Ms. Applewhite testified that, in the past five years, she has made numerous, unsuccessful, attempts to obtain an ID from PennDOT. Hr'g Tr. at 108:4-10, July 25, 2012. Specifically, her identification documents, including her Virginia non-driver ID and her Social Security card, were stolen with her purse several years ago. Hr'g Tr. at 105:13-23, July 25, 2012. While she obtained a Pennsylvania birth certificate with a lawyer's assistance, she had not been eligible to obtain a PennDOT ID because she does not have a Social Security card and her birth certificate is in her birth name, Viviette Virene Brooks, while her

Social Security records and proofs of residency are in the name Viviette Applewhite. Hr'g Tr. at 109:17-110:16, 112:4-18, July 25, 2012.[7]

Similarly, Petitioner Wilola Shinholster Lee, a registered voter in Pennsylvania, was born in rural McIntyre, Georgia in 1952 and has not missed voting in an election since she registered at 18. Hr'g Tr. at 71:10-15, 74:6-16, July 25, 2012. She testified that she did not have a PennDOT ID or any other ID acceptable under Pennsylvania's Photo ID Law. Hr'g Tr. at 76:3-11, July 25, 2012. She has tried without success to obtain a PennDOT ID for over 12 years, but is ineligible because she had not been able to obtain her Georgia birth certificate. Hr'g Tr. at 82:7-83:7, July 25, 2012. Though Ms. Lee has persistently tried to get her birth certificate, including with the assistance of a lawyer, she testified that she has been told that Georgia has no record of her birth. Hr'g Tr. at 82:7-85:1, July 25, 2012.

In addition, the Court heard from Ana Gonzalez, a registered voter in Pennsylvania, who was born in Puerto Rico in 1949 and later adopted. Hr'g Tr. at 138:7-141:7, July 25, 2012. Ms. Gonzalez testified that she could not obtain a PennDOT ID because she did not have a birth certificate. Hr'g Tr. at 144:23-145:3, July 25, 2012. For the past five years, Ms. Gonzalez attempted to obtain a birth certificate from Puerto Rico, but could not obtain a certificate because she needs a Photo ID to do so and because she does not know the names of her birth parents. Hr'g Tr. at 141:2-7, 146:23-148:24, July 25, 2012. Further, Danny Rosa, a registered voter in Pennsylvania, was born in New York City in 1949 as Danny Guerra, but received the name Rosa

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[7] After the July 2012 hearing, Petitioner Applewhite was able to obtain a PennDOT ID even though she still did not possess the required documentation necessary to obtain a PennDOT ID. *See* Jessica Parks, Lead plaintiff in Pa. voter ID case gets her photo ID, THE PHILADELPHIA INQUIRER, Aug. 17, 2012, available at http://articles.philly.com/2012-08 17/news/33233715_1_penndot-id-new-voteridentification- law-penndot-center.

from his stepfather. Hr'g Tr. at 853:21, 854:12-855:4, July 30, 2012. Mr. Rosa explained that he did not have any acceptable ID under the Photo ID Law. Hr'g Tr. at 859:18-860:24, July 30, 2012. Mr. Rosa, who served his country as a sergeant in the United States Air Force and was honorably discharged, has a veterans card, but it is not acceptable ID for voting because it lacks an expiration date. Hr'g Tr. at 856:11-857:1, 860:12-16, July 30, 2012. After learning about the Photo ID Law, Mr. Rosa went to PennDOT twice to try get a photo ID, but was rejected both times because his name on his New York birth certificate is Guerra (the name with which he was born), but his Social Security card and his voter registration record are in the name he has used virtually his entire life, Rosa. Hr'g Tr. at 862:14-866:16, July 30, 2012; Pet'rs' Ex. 32.

Leila Stones, a registered voter in Pennsylvania who was born at home in Virginia in 1959, also testified that she had no forms of acceptable ID under the Photo ID Law. Hr'g Tr. at 167:11-14, 171:11-173:7, July 25, 2012. Ms. Stones has made several, unsuccessful attempts to obtain a copy of her Virginia birth certificate, but was told by the Virginia Department of Vital Statistics that the state has no record of her birth. Hr'g Tr. at 169:16-24, July 25, 2012. Ms. Stones, upon learning of the Photo ID Law, called DOS about her situation, but explained to the Court that the individuals she spoke with gave her "the run around" and did not provide her with information to help her obtain a Photo ID for voting purposes. Hr'g Tr. at 175:4-176:19, July 25, 2012. Further, Stanley Garrett, a registered voter in Pennsylvania born in 1967 in North Carolina who is a former Marine, testified that although he has a veterans photo ID card, it is not acceptable for voting under the Law because it lacks an expiration date. Hr'g Tr. at 153:11-16, 154:24-155:13, 158:2-159:14, July 25, 2012. Mr. Garrett testified that he could not obtain a PennDOT ID because, although he has a Social Security card and two proofs of residency, he

does not have and has not been able to obtain his birth certificate from North Carolina. Hr'g Tr. at 159:21-162:16, July 25, 2012.

Commonwealth witnesses, in turn, testified that PennDOT rejects applicants for PennDOT ID because they are unable to provide a raised seal birth certificate,[8] Social Security card, or two proofs of residency. Hr'g Tr. at 698:4-699:5, July 27, 2012 (K. Myers); Hr'g Tr. at 9:24-10:14, July 30, 2012 (J. Marks). Obtaining the underlying documentary evidence required to receive a PennDOT ID is a confusing process that costs money, can take years, and is difficult even for lawyers to navigate. Hr'g Tr. at 208:15-211:5, 219:13-23, 225:10-26:22, 249:11-14, July 25, 2012 (V. Ludt); Hr'g Tr. at 651:11-23, July 27, 2012 (M. Levy).[9] This Court heard extensive expert testimony regarding the difficulties faced by individuals in obtaining birth certificates, in particular, by those individuals born outside of Pennsylvania. Hr'g Tr. at 207:17-208:4, 209:3-215:9, 219:13-23, July 25, 2012 (V. Ludt). These witnesses testified how birth certificates can be difficult to obtain because individuals are stuck in a "catch-22" of needing a birth certificate to obtain a photo ID and needing a photo ID to obtain a birth certificate. Hr'g Tr. at 207:17-209:20, July 25, 2012 (V. Ludt); Hr'g Tr. at 645:19-656:17, July 27, 2012 (M. Levy). Some individuals go through the process and, even with the assistance of a lawyer, never

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[8] After this lawsuit was filed, the Commonwealth announced on May 23, 2012 that it would allow PennDOT to check with the Pennsylvania Department of Health ("DOH") for the latter to locate birth records electronically for native-born Pennsylvania residents. If DOH can locate the birth records, then an applicant can avoid having to produce a raised seal birth certificate. For some native-born Pennsylvanians, DOH will not be able to locate a birth record. Hr'g Tr. at 479:1-6, Pet'rs' Ex. 20. In addition, this procedure is not available for persons not born in Pennsylvania.

[9] The difficulties relating to obtaining birth certificates apply to every Pennsylvanian born in Puerto Rico. In 2010, the government of Puerto Rico announced that all birth certificates issued prior to that point in time were invalid. Hr'g Tr. at 660:10-662:8, July 27, 2012 (M. Levy).

receive a birth certificate. Hr'g Tr. at 205:17-20, 212:18-213:19, July 25, 2012 (V. Ludt); Hr'g Tr. at 651:18-23, July 27, 2012 (M. Levy). In some instances, a state may not have a birth record because the individual was born at home or because hospital records were destroyed. Hr'g Tr. at 205:17-20, 212:18-213:19, July 25, 2012 (V. Ludt). Even when individuals are able to obtain birth certificates from their states of birth, the certificates can be rejected by PennDOT clerks who are unfamiliar with out-of-state records. Hr'g Tr. at 230:12-231:19, July 25, 2012 (V. Ludt).

In addition, these witnesses testified to the fact that many homeless and financially disadvantaged voters who lack identification face particular difficulty in navigating the process for obtaining ID. Veronica Ludt testified that these individuals face income limitations, are transient and have lost key documentation, and are simply unaware of how to obtain the underlying documentation necessary to obtain ID. Hr'g Tr. at 226:23-227:13, July 25, 2012 (V. Ludt). These individuals also have limited access to TV, phones and the internet. Hr'g Tr. at 217:17-219:12, 258:1-4, July 25, 2012 (V. Ludt).

Many voters also face difficulties in obtaining Social Security cards because of a lack of ID or the other documents required to obtain replacement cards. Hr'g Tr. at 220:19-224:1, July 25, 2012 (V. Ludt); Hr'g Tr. at 657:9-658:16, July 27, 2012 (M. Levy); Pet'rs' Ex. 14. And some persons also have difficulty providing proofs of residency necessary to obtain a PennDOT ID. Hr'g Tr. at 224:11-24, July 25, 2012 (V. Ludt).

Apart from difficulties in qualifying for PennDOT ID, simply getting to PennDOT is a burden for many voters. Nine counties in Pennsylvania have no PennDOT location that issue photo ID. Pet'rs' Exs. 25, 26; Hr'g Tr. at 703:11-20, July 27, 2012 (K. Myers). Less than half of PennDOT centers are open five days per week, and even for those centers that are open five days

a week, some do not have the capacity to issue photo IDs on each day. Pet'rs' Exs. 25, 26; Hr'g Tr. at 705:3-9, July 27, 2012 (K. Myers); Hr'g Tr. at 555:19-559:15, Sept. 27, 2012 (K. Myers); Hr'g Tr. at 451:22-452:3, Sept. 27, 2012 (S. Lipowicz). Specifically, thirteen counties have PennDOT facilities issuing IDs open only one day a week, and ten counties have PennDOT facilities open only two days a week. Pet'rs' Exs. 25, 26.

Further, mass transit options for getting to PennDOT locations are limited or non-existent in some locations, especially rural locations. Hr'g Tr. at 1080:6-10, July 31, 2012 (S. Jarrell); 1092:18-1093:16, July 31, 2012 (J. Horn); Hr'g Tr. at 1104:22-1106:13, July 31, 2012 (J. Tosti-Vasey). Getting to PennDOT therefore necessarily involves a cost, whether it be mass transit fare or gas. Hr'g Tr. at 1092:18-1093:3, July 31, 2012 (J. Horn); Hr'g Tr. at 995:23-996:2, July 31, 2012 (C. Aichele). Commonwealth witnesses testified that PennDOT had not created any mobile ID units or made plans to get elderly, disabled or financially disadvantaged voters to PennDOT facilities without charging them a fee. Hr'g Tr. at 750:10-15, July 27, 2012 (K. Myers); Hr'g Tr. at 72:18-75:64, 113:10-114:8, Sept. 25, 2012 (K. Myers). The Secretary of the Commonwealth explained that she had asked PennDOT to create a mobile ID center that could travel to those without IDs, but PennDOT refused. Hr'g Tr. at 997:11-998:14, July 31, 2012.

Further, PennDOT itself is set up to issue driver's licenses, which are a privilege rather than a right, and is in certain respects hostile to or indifferent to the affirmative need to ensure that voters obtain the ID they need to vote. Witnesses testified that visits to PennDOT centers for information about the Photo ID Law and to obtain free IDs involved standing and waiting in line from 25 minutes to up to an hour. Hr'g Tr. at 1058:10-22, July 31, 2012 (M. Rawley); 1080:25-1082:12, July 31, 2012 (S. Jarrell); 1110:16-23, July 31, 2012 (J. Tosti-Vasey). Signage, brochures, and other information about the Photo ID Law were non-existent in some

locations and difficult to locate in others, and individuals working at PennDOT centers were not always equipped to answer questions about obtaining free ID under the Photo ID Law. Hr'g Tr. at 1055:13-1058:4, July 31, 2012 (M. Rawley); Hr'g Tr. at 1081:2-17, July 31, 2012 (S. Jarrell); 1094:2-1098:15, July 31, 2012 (J. Horn). The evidence illustrates that by July 2012, there were still instances where PennDOT failed to ask individuals if they were seeking ID for voting purposes and told people they would be charged for ID for voting purposes. Pet'rs' Ex. 45; Hr'g Tr. at 882:18-883:4, July 30, 2012 (J. Block); Hr'g Tr. at 998:19-999:5, July 31, 2012 (C. Aichele), Hr'g Tr. at 1052:19-1053:25, 1059:18-1060:18, July 31, 2012 (M. Rawley); Hr'g Tr. at 1082:22-1083:25, July 31, 2012 (S. Jarrell); Hr'g Tr. at 1108:18-1109:2, July 31, 2012 (J. Tosti-Vasey).

In addition, many voters are also unable to travel to PennDOT to obtain necessary photo identification because of illness, age, or disability. For example, Petitioner Bea Bookler, a registered voter in Pennsylvania who was born in Philadelphia in 1918, testified that traveling to a PennDOT Drivers License Center to obtain photo ID would be a strenuous physical burden for her. Hr'g Tr. at 946:4-9, 949:17-950:9, 953:16-954:1, 958-60, July 30, 2012 (B. Bookler). Ms. Bookler lives in an assisted-living facility in Devon, Chester County and seldom leaves her room, but always goes to vote at the polling center next door to her assisted-living facility. Hr'g Tr. at 945:1-8, 945:18-946:3, July 30, 2012. Ms. Bookler no longer has any form of photo identification that is acceptable under the Photo ID Law, and her assisted-living facility does not issue photo ID. Hr'g Tr. at 949:4-950:9, 954:2-7, July 30, 2012. Because she was able to attend her polling place, she was not eligible to cast an absentee ballot because she could not truthfully make the required statement that she is a "qualified registered and enrolled elector who because of illness or physical disability is unable to attend [her] polling place." 25 P.S. § 3146.1(k).

Similarly, Taylor Floria, a 19 year old high school student with autism and other disabilities testified that, because of his disabilities, travelling to and visiting the nearest PennDOT Driver's License Center, located thirty-five miles from his house, in order to obtain a PennDOT ID is extremely difficult. Hr'g Tr. at 604:13-605:25, July 27, 2012. Mr. Floria testified that he had previously travelled to PennDOT in an attempt to obtain acceptable ID but the experience was too overwhelming for him and he was forced to leave before he was able to obtain an ID. Hr'g Tr. at 604:110-14, July 27, 2012.[10]

Finally, Allegheny County Elections Division Manager Mark Wolosik testified that the Photo ID Law requirements will impose significant new burdens on Pennsylvania's already overtaxed election system. Mr. Wolosik expressed his concern that the Law's requirements would exacerbate the already-long lines at the polls that occurred during the 2008 Presidential elections, Hr'g Tr. at 574:19-576:3, 585:10-15, July 27, 2012, confuse poll workers because of the complex rules regarding which IDs are valid, and whether photos and names sufficiently resemble the voter to permit them to cast a regular ballot, Hr'g Tr. at 585:10-12, July 27, 2012, and lead to many qualified voters being forced to vote provisionally, which means many of them will not be counted. Hr'g Tr. at 576:25-581:14, July 27, 2012.

D. The Department of State ID Card

In response to this litigation, Respondents announced, on the eve of the first preliminary injunction trial, that they would soon begin offering a new kind of photo ID that would have less rigorous requirements than the secure PennDOT ID: the DOS ID. Hr'g Tr. at 711:16-714:21,

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[10] After the July 2012 hearing, Mr. Floria attended a one week summer program from West Chester University, at which he received a University identification card with his name, photo and an expiration date of June 2017 that would allow him to vote on election day.

July 27, 2012 (K. Myers); Pet'rs' Ex. 20 (Email from K. Kotula to S. Royer et al. (June 12, 2012)) (identifying various "groups that may need to obtain the DOS ID because they may not be able to obtain the free non-driver's license photo ID from [PennDOT]"). The purpose was to "mitigate" concerns raised by this lawsuit. Hr'g Tr. at 783:14-20, July 30, 2012 (J. Marks). The work would be done principally by PennDOT, but DOS would be the official issuer because PennDOT did not wish to create a non-secure ID. Hr'g Tr. at 713:24-715:1, July 27, 2012 (K. Myers). Initially, PennDOT and DOS targeted July 24, 2012 as the launch date for the new ID. Hr'g Tr. at 554:25-555:3, July 27, 2012 (S. Royer). The new ID did not launch on that date. Hr'g Tr. at 554:25-555:17, July 27, 2012 (S. Royer). PennDOT then targeted August 27, 2012 for the first issuance of a DOS card. Hr'g Tr. at 706:8-13, July 27, 2012 (K. Myers). PennDOT announced that the DOS card was available on August 27, 2012. Hr'g Tr. at 22:17-20, Sept. 25, 2012 (K. Myers).

The DOS ID card is the creation of the executive branch -- no statute requires the creation of the DOS ID or otherwise mentions or addresses it in any fashion. Hr'g Tr. at 824:16-826:13, July 30, 2012 (J. Marks). Commissioner of the Bureau of Commissions, Elections and Legislation with the DOS Jonathan Marks conceded that DOS did not issue regulations governing the DOS card, but instead used its own, internal rules to issue the card. Hr'g Tr. at 824:16-825:20, July 30, 2012. If the Commonwealth wanted to change the eligibility rules for the card, or discontinue the card altogether, it could do so with no review. Hr'g Tr. at 825:5-826:20, July 30, 2012 (J. Marks).

PennDOT Deputy Secretary Kurt Myers testified that it was important that the card not be the statutory PennDOT non-driver's license identification card established by 75 Pa. Cons. Stat. § 1510(b). He explained that PennDOT would not relax the requirements for that secure ID

because "over the years, the driver's license ID card has become the recognized form of identification across the country, for that matter across the world," and "the expectation on the part of banks, commercial airlines and others who are dependent on ensuring that the person who is who they say they are that's standing in front of them has relied on the integrity of the driver's license ID issuance process." Hr'g Tr. at 728:9-729:14, July 27, 2012. Mr. Myers explained, "there is a trust, a fundamental trust that exists perhaps unwritten or unspoken, but certainly by the fact that those items are taken for the purposes of getting on an aircraft," and "even more so after 9/11." Hr'g Tr. at 729:3-9, July 27, 2012. PennDOT officials thus believed it critical to maintain the rigorous requirements for applicants to obtain a secure PennDOT ID, and PennDOT would not compromise the security of the card by relaxing those requirements. Hr'g Tr. at 689:11-690:16, 699:6-11, 713:9-714:12, July 27, 2012 (K. Myers).

The DOS ID was originally designed as a "safety net" for voters who could not obtain a PennDOT ID, and became available on August 27, 2012. Hr'g Tr. at 709:12-20, July 27, 2012 (K. Myers); Hr'g Tr. at 24:13:20, Sept. 25, 2012 (K. Myers). Under the first iteration of the DOS ID, voters were required to exhaust all other options before obtaining a DOS card. Pet'rs' Ex. 107; Hr'g Tr. at 25:24-26:4, 27:19-28:1, Sept. 25, 2012 (K. Myers). In order to apply for a DOS card, voters were required to sign an affirmation declaring under threat of criminal penalties that "I am unable to obtain a [PennDOT card] because I do not possess all of the documentation required to obtain a PennDOT ID card and cannot obtain the needed documentation, or cannot obtain the documentation without payment of a fee." Pet'rs' Ex. 220. Even if a voter did sign the affirmation that he or she could not obtain documentation for a PennDOT card, it was left to an individual PennDOT clerk to decide whether "[b]ased on the

documentation and information provided, the voter identified above cannot be issued a PennDOT ID card." *Id.*

If PennDOT determined that a voter was unable to obtain a PennDOT ID, then PennDOT employees required applicants to fill out a form and had to take certain steps necessary to issue a DOS card, including checking the applicant's name and date of birth against the SURE database through a manual call to DOS, confirming that the applicant's address is a valid mailing address, and, if the citizen has a Social Security number, verifying that the applicant's name matches the Social Security number. Hr'g Tr. at 798:12-799:25, July 30, 2012 (J. Marks).

This exhaustion requirement imposed significant burdens on registered voters. For example, under the procedures in effect until at least September 19, 2012, a Pennsylvania-born voter who could not obtain a secure PennDOT card for want of a birth certificate was forced to go through the DOH birth record verification process, which required the applicant to leave PennDOT for "somewhere between 7 to 10 days" before making a second trip to PennDOT (assuming DOH verified the birth record) to complete the application process for a PennDOT card. Hr'g Tr. at 31:4-33:19, Sept. 25, 2012 (K. Myers). Only if that application failed was the voter permitted to apply for a DOS ID card.[11] Further, even after voters demonstrated they could not satisfy the PennDOT ID requirements, PennDOT and the DOS required applicants, among other things, to provide two proofs of residence, a Social Security Number, authorize a Social Security verification process, and submit to facial recognition analysis. Pet'rs' Ex. 220.

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[11] Respondent witnesses testified that, on or about September 20, 2012, PennDOT changed its procedures to adopt a same-day system for verifying birth records for Pennsylvania-born voters. Hr'g Tr. at 33:19-38:9, Sept. 25, 2012 (K. Myers).

On September 25, 2012, Respondents again changed their procedures for issuing DOS ID cards. Under the new procedures, the DOS ID card would no longer be only a "safety net" product, but instead would be available to any registered voter who signed the two-point declaration that the Photo ID Law attached the PennDOT ID. Hr'g Tr. at 24:22-25:1, Sept. 25, 2012 (K. Myers). However, applicants are still required, among other things, to sign an affirmation that they are registered to vote and have no other form of ID, provide a Social Security Number, authorize a Social Security verification process, and submit to facial recognition analysis. Hr'g Tr. at 163:6-15, Sept. 25, 2012 (S. Royer). For registered voters whose registration status could not be immediately verified by DOS, PennDOT will not issue the DOS ID during the individuals' visit. Hr'g Tr. at 495:2-8, 520:16-21, Sept. 27, 2012 (J. Marks). Instead, the ID will be mailed to DOS, which in turn may eventually send the ID to the voter if DOS eventually can verify that the voter is registered. Hr'g Tr. at 507:16-20, Sept. 27, 2012 (J. Marks).

The evidence set forth in the September 2012 remand hearing demonstrated the substantial obstacles faced by voters in attempting to obtain DOS ID cards, and established that many voters had been unable to procure this ID. For example, the Court heard testimony from voters who were forced to wait unreasonably long wait times at PennDOT locations, and some left before receiving any service. Hr'g Tr. at 315:21-23, 317:2-4, Sept. 27, 2012 (D. Clark); Hr'g Tr. at 332:8-21, Sept. 27, 2012 (L. Pannell); Hr'g Tr. at 348:11-17, 357:20-358:1, Sept. 27, 2012 (L. Purdie); Hr'g Tr. at 371:5-8, Sept. 27, 2012 (P. Cobb); Hr'g Tr. at 391:3-392:5, Sept. 27, 2012 (D. Bellisle); Hr'g Tr. at 453:17-24, Sept. 27, 2012 (S. Lipowicz); Hr'g Tr. at 473:16-20, 475:2-16, Sept. 27, 2012 (A. Maxton); Hr'g Tr. at 539:8-21, 545:22-549:9, 552:8-555:8, Sept.

27, 2012 (K. Myers); *see also* Pet'rs' Ex. 139 (showing that almost 75% of customers at the Arch Street location in Philadelphia waited over 30 minutes to be serviced).

In addition, voters also had to make multiple trips to PennDOT in order to try to obtain an ID card. Hr'g Tr. at 310:20-24, 317:22-318:18, Sept. 27, 2012 (D. Clark), Hr'g Tr. at 336:3-6, Sept. 27, 2012 (L. Pannell); Hr'g Tr. at 355:23- 356:12, Sept. 27, 2012 (L. Purdie); Hr'g Tr. at 390:23-391:2, Sept. 27, 2012 (D. Bellisle); Hr'g Tr. at 408:23-24, Sept. 27, 2012 (J. Hockenbury); Hr'g Tr. at 446:10-12, Sept. 27, 2012 (A. Thompson); Hr'g Tr. at 451:4-6, 451:18-452:3, 453:10-12, Sept. 27, 2012 (S. Lipowicz); Hr'g Tr. at 473:12-22, Sept. 27, 2012 (A. Maxton). Voters were also forced to pay for an ID card that should have been provided at no charge. Hr'g Tr. at 371:18-372:17, Sept. 27, 2012 (P. Cobb); Hr'g Tr. at 450: 4-16, Sept. 27, 2012 (L. Purdie); Hr'g Tr. at 443:12-444:22, Sept. 27, 2012 (A. Thompson); Hr'g Tr. at 458:15-461:15, Sept. 27, 2012 (D. Curry); Hr'g Tr. at 567:13-574:4, Sept. 27, 2012 (K. Myers).

Further, the Court heard testimony that PennDOT locations did not always have the necessary documentation to obtain an ID card, did not always understand the documentation that was required to obtain an ID card, and in at least one instance, created a new affidavit on its own, and in another instance, informed voters that PennDOT is no longer issuing free DOS ID cards. Hr'g Tr. at 315:24-318:22, Sept. 27, 2012 (D. Clark); Hr'g Tr. at 351:6-11, 358:5-21, 359:9-360:9, Sept. 27, 2012 (L. Purdie); Hr'g Tr. at 392:15-394:9, 395:1-396:16, Sept. 27, 2012 (D. Bellisle); Hr'g Tr. at 407:17-408:2, 409:23-12:3, 414:4-15, 415:11- 416:5, Sept. 27, 2012 (J. Hockenbury); Hr'g Tr. at 427:13-429:19, 433:23- 434:24, 438:8-13, 439:15-441:16, Sept. 27, 2012 (A. Thompson); Hr'g Tr. at 450:16-20, 453:13-16, Sept. 27, 2012 (S. Lipowicz); Hr'g Tr. at 476:3- 10, Sept. 27, 2012 (A. Maxton).

The record also contains numerous examples of voters who were sent home from PennDOT with no DOS ID card, either because they did not have two proofs of residence or because PennDOT was unable verify a voter's registration even though the voter is registered. Hr'g Tr. at 315:24-318:1, Sept. 27, 2012 (D. Clark); Hr'g Tr. at 333:10-17, 335:16-18, Sept. 27, 2012 (L. Pannell); Hr'g Tr. at 352:7-355:7, Sept. 27, 2012 (L. Purdie.); Hr'g Tr. at 385:19-387:10, 387:19-90:10, Sept. 27, 2012 (D. Bellisle); Hr'g Tr. at 408:12-20, Sept. 27, 2012 (J. Hockenbury). Petitioners submitted a Commonwealth-produced document with files from 113 applicants who were initially denied DOS ID cards by PennDOT, sent home, and told to follow up with the Department of State. Pet'rs' Exs. 217-18. Of the at least 113 applicants initially denied a DOS card, the DOS eventually confirmed approximately 43 of those applicants to be qualified for the DOS card, which demonstrates that the applicants had been erroneously rejected initially. And, the Commonwealth's internal documents reflected that as many as 25% of applicants had issues obtaining a DOS ID card. Pet'rs' Ex. 149; Hr'g Tr. at 214:8-23, Sept. 25, 2012 (J. Marks).

For recently registered voters, PennDOT had regularly been denying them a DOS ID card because the Commonwealth's procedures require that their names first appear in the registration database, and this process takes about two to four weeks, depending on the county and how busy they are processing new and address-change registrations. Decl. of Mark Wolosik (filed Sept. 26, 2012); Hr'g Tr. at 501:6-503:6, Sept. 27, 2012 (J. Marks).

In light of these problems, the Commonwealth's witnesses readily acknowledged that the initial roll out of the DOS ID cards had been far from seamless. Hr'g Tr. at 79:5-13, Sept. 25, 2012 (K. Myers) (describing "concerns that were being expressed"); Hr'g Tr. at 193:14-19, Sept. 25, 2012 (J. Marks) ("We have had complaints."); Hr'g Tr. at 231:6-10, Sept. 25, 2012 (J.

Marks) (describing "bumps in the road"); *see also* Pet'rs' Ex. 239 (discussing inability initially to handle call volume).

E. The Commonwealth's Voter Education Campaign

In July 2012, the Court also heard testimony regarding the Commonwealth's planned outreach and education efforts regarding the Photo ID Law. The record established in the September 2012 hearing, however, confirmed that the Commonwealth's outreach and education efforts were minimal and designed to inform voters they could not vote without ID.

First, the Commonwealth explained it had accessed $5 million for the voter education effort through the Help America Vote Act ("HAVA"), which provides funding for voter education in federal election years. Hr'g Tr. at 514:22-515:11, July 27, 2012 (S. Royer); Hr'g Tr. at 1019:9:1022:3, July, 31, 2012 (C. Aichele). However, this money can only be used in a federal election year. Hr'g Tr. at 514:22-515:11, July 27, 2012 (S. Royer). The Commonwealth also conceded it had not conduct an analysis of the dollar amount that would be required to reach every Pennsylvania voter. Hr'g Tr. at 548:17-21, July 27, 2012 (S. Royer).

During the July 2012 hearing, Commonwealth witnesses testified regarding the specifics of its planned voter education efforts. According to Deputy Secretary Shannon Royer of the DOS, this education effort would focus on "inform[ing] people that they need to show ID when they vote this fall and to explain to them the kinds of IDs that they can use and where to get an ID if they currently don't have one." Hr'g Tr. at 516:17-518:2, July 27, 2012. For example, the Commonwealth outlined its plan to send a mailing to approximately 5.9 million households in Pennsylvania before the November 6, 2012 election that would provide information on the Photo ID Law. Hr'g Tr. at 516:17-518:2, July 27, 2012 (S. Royer). According to Mr. Marks, the mailing would purportedly "provide information about what you need [to vote], and if you want

it, here's how to get it," and that it would be in both English and Spanish. Hr'g Tr. at 823:5-11, July 30, 2012. Mr. Royer also explained that the Commonwealth was planning to use a radio, television, and website ad campaign that would communicate information on the Photo ID Law, and that the Commonwealth had also planned to use automated phone calls to reach out to and inform voters on the Law. Hr'g Tr. at 516:17-518:2, July 27, 2012.

The record during the September 2012 hearing, however, established that the Commonwealth's assurances at the July hearing regarding these planned efforts had not come to fruition. Most of the advertisements that the Commonwealth created made no mention of the DOS ID card or the fact that free, easier-to-obtain identifications cards were available. Nor did the advertisements provide any information about how to obtain an acceptable identification beyond telling people to contact "VotesPA." Pet'rs' Ex. 179 (TV scripts); Pet'rs' Ex. 178 (radio scripts); Pet'rs' Exs. 172, 174 (transit/bus advertisements); Pet'rs' Ex. 173 (billboards). Many of the advertisements show only a picture of a driver's license. The advertisements thus focused on informing voters they must show ID to be permitted to vote. The slogan of the campaign was that they must "Show It" to be permitted to vote, *e.g.*, Hr'g Tr. at 141:5-7, Sept. 25, 2012 (S. Royer), and the advertisements focused on informing voters that "to vote in Pennsylvania on Election Day, you need an acceptable photo ID with a valid expiration date." Pet'rs' Ex. 179. Further, the mailing to 5.9 million households consisted of a postcard that (i) provided no information – other than telling people to "get one . . . with supporting documentation" – about how to obtain an acceptable identification; (ii) showed only a driver's license and did not explain the DOS ID card; and (iii) was sent out only in English. Pet'rs' Ex. 115 (postcard); Hr'g Tr. at 151:22-24, Sept. 25, 2012 (S. Royer)

Further, Commonwealth witnesses testified that the Commonwealth intentionally limited nearly all of its voter education activities to roughly two months before the November election. Hr'g Tr. at 521:17-23, July 27, 2012 (S. Royer) ("The intensive effort would shortly be after Labor Day"); Hr'g Tr. at 244:3-5, Sept. 25, 2012 (S. Royer) ("[T]he majority of that push is occurring now and will occur into the future; that's correct."); Hr'g Tr. at 247:5-7, Sept. 25, 2012 (S. Royer) ("I believe the majority of the ad buy is occurring – is ramping up now and will continue over the next several weeks."); Hr'g Tr. at 247:8-10, Sept. 25, 2012 (S. Royer) ("Q. And that's entirely intentional on the part of the Department of State; right? A. Right."). By September 2012, however, the Commonwealth had taken no active steps to measure the effectiveness of its campaign to educate voters about the Photo ID Law. Hr'g Tr. at 156:7-13, Sept. 25, 2012 (S. Royer). Mr. Royer instead testified that the Commonwealth instead planned to do so "at the end of [the] campaign, not during [the] campaign." Hr'g Tr. at 156:7-16, Sept. 25, 2012.

F. The Commonwealth's Interest

The Commonwealth's asserted justifications for the Photo ID Law were to prevent fraud and ensure public confidence in the electoral process.[12] Pet'rs' Ex. 46. Petitioners' expert witness Dr. Lorraine Minnite testified that the only type of fraud addressed by the photo

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[12] The Commonwealth identified the interest justifying the Photo ID Law as:

> Requiring a photo ID is one way to ensure that every elector who presents himself to vote at a polling place is in fact a registered elector and the person that he purports to be, and to ensure that the public has confidence in the electoral process. The requirement of a photo ID is a tool to detect and deter voter fraud.

Pet'rs' Ex. 46.

requirement is in-person fraud: someone trying to impersonate a voter a the polling place. Hr'g Tr. at 1313:18-20, Aug. 1, 2012. However, the Commonwealth conceded that it knew of no instances of in-person voter fraud in Pennsylvania and that it did not claim that such fraud was likely to occur in the November 2012 election absent the Photo ID Law. Pet'rs' Ex. 15. The DOS's Director of Policy conceded that, if the Photo ID Law prevented eligible qualified voters from voting, it would reduce the integrity of elections. Hr'g Tr. at 480:3-6, July 26, 2012 (R. Oyler). No evidence or testimony was presented at the hearing to show how the Law would enhance public confidence in elections.

Commonwealth witnesses repeatedly conceded that it is unnecessary to have a secure ID to vote. Hr'g Tr. at 781:1-20, July 30, 2012 (J. Marks); Hr'g Tr. at 994:22-95:1, July 31, 2012 (C. Aichele). Thus, the nursing home ID -- which has no virtually no safeguards and is not a secure ID -- permits one to vote. Hr'g Tr. at 781:1-6, July 30, 2012 (J. Marks), Hr'g Tr. at 979:20-983:14, July, 31, 2012 (C. Aichele). Similarly, if one is eligible to vote absentee, one need not produce a PennDOT or other secure ID.[13] Hr'g Tr. at 781:7-10, July 27, 2012 (J. Marks), Hr'g Tr. at 983:15-986:1, July 31, 2012 (C. Aichele). Likewise, one can vote with a valid PennDOT ID obtained before 9/11, even though the requirements for obtaining an ID were much less rigorous. Hr'g Tr. at 781:11-16, July 30, 2012 (J. Marks). A college ID can be used to vote if it has an expiration date, but it also is not a secure ID. Hr'g Tr. at 771:18-23, July 30, 2012 (J. Marks); Hr'g Tr. at 986:2-9, July 31, 2012 (C. Aichele).

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[13] Voters casting absentee ballots may identify themselves by providing only either a current and valid driver's license number or the last four digits of his or her Social Security number; no other proof of identification is required. 25 P.S. § 2602(z.5)(3)(i),(ii).

Finally, there was unrebutted evidence that the asserted justifications for the Photo ID Law are pretextual. In Republican State Committee meetings on or about June 23, 2012, House Majority leader, Mike Turzai, candidly boasted to his colleagues that the Law is "gonna allow Governor Romney to win the state of Pennsylvania." Hr'g Tr. at 964:18-965:3; Pet'rs' Exs. 41, 42.

Applewhite, et al. v. Commonwealth of Pennsylvania, et al.
No. 330 MD 2012

EXHIBIT 2

Petitioners' Pre-Trial Statement And Application For Special Relief In The Nature Of A Preliminary Injunction

EXHIBIT 2

Applewhite et al. v. Commonwealth: Petitioners' Proposed Witnesses[1]

Pursuant to Rule 212.2 of the Pennsylvania Rules of Civil Procedure, Petitioners list the following witnesses who may be called during the hearing:

Aichele, Carol
Pennsylvania Department of State

Applewhite, Viviette
5457 Wayne Ave., Apt. 805
Philadelphia, PA 19144

Baker, Marion (testifying by video or trial preservation deposition)
1200 Mulberry Street
Reading, PA 19604

Barreto, Matt A.
University of Washington
Department of Political Science, Box 353530
Seattle, WA 98195

Blint, Gloria (testifying by video or trial preservation deposition)
Red House Communications Inc.
1908 Sarah Street
Pittsburgh, PA 15203

Bookler, Beatrice
97 Valley Green Road
Doylestown, PA 18901

Brown, William
600 E. Luzerne Street
Philadelphia, PA 19124

Bruckner, Adam
PO Box 14057
Philadelphia, PA 19122

Burgess, David
Formerly with the Pennsylvania Department of State

[1] Per the Court's May 28, 2013 Order, expert reports are due on July 1, 2013. Petitioners reserve the right to identify additional experts as witnesses at that time.

Collins, Laverne
Pennsylvania Department of Transportation

Cuttino, Gloria
5813 Baynton Street
Philadelphia PA 19144

Geho, Patrick
Formerly with the Pennsylvania Department of State

Ginensky, Herbert
2 Franklin Town Boulevard, Apt. 1311
Philadelphia, PA 19103

Giuliana, Teresa (testifying by video or trial preservation deposition)
779 Livezey Lane
Philadelphia, PA 19128

Harlow, Ian
Pennsylvania Department of State

Howell, Catherine (testifying by video or trial preservation deposition)
1 Hillcrest Avenue, Apt. 606
Morrisville, PA 19067

Kukowski, Theresa
2224 Napfle Street
Philadelphia, PA, 19152

Levy, Michele
Homeless Advocacy Project
42 S. 15th Street, 4th Floor
Philadelphia, PA 19102

Ludt, Veronica
Face to Face Germantown
109 Price Street
Philadelphia, PA 19144

Malave, Marcos
3901 Roosevelt Boulevard, Apt. 19B
Philadelphia, PA 19124

Marks, Jonathan
Pennsylvania Department of State

Marsh, Nadine
145 Sandy Drive
Clinton, PA 15026

Minnite, Lorraine C.
Department of Public Policy & Administration
Rutgers University
401 Cooper Street
Camden, N.J. 08102

Mondesire, Jerome
National Association for the Advancement of Colored People, Pennsylvania State Conference
P.O. Box 29740
Philadelphia PA 19119

Myers, Kurt
Pennsylvania Department of Transportation

Norton, Patricia
27 S. Front Street
Womelsdorf, PA 19567

O'Donnell, Kelly
Pennsylvania Department of Aging

Oyler, Rebecca
Pennsylvania Department of State

Pennington, Margaret G.
218 Pennsylvania Avenue
Avondale, PA

Pripstein, Mina (testifying by video or trial preservation deposition)
2401 Pennsylvania Avenue
Philadelphia, PA 19130

Proctor, David
322 N Second Street
Harrisburg, PA 17101

Reigle, Carol
300 Lackawanna Street, Apt 7R
Reading, PA 19601

Representative from the League of Women Voters

Riley, Jennifer
Bravo Group
20 N. Market Square, Suite 800
Harrisburg, PA 17101

Robertson, Diana
National Association for the Advancement of Colored People, Pennsylvania State Conference
P.O. Box 29740
Philadelphia PA 19119

Rogoff, Andrew
3000 Two Logan Square
Eighteenth & Arch Streets
Philadelphia, PA 19103-2799

Royer, Shannon
Pennsylvania Department of State

Ruman, Ronald
Pennsylvania Department of State

Schor, Asher
608 S. Millvale Avenue
Pittsburgh, PA 15224

Shinholster Lee, Wilola
5860 Osceola Place
Philadelphia, PA 15219

Strickler, Lyn (testifying by video or trial preservation deposition)
Harmelin Media
525 Righters Ferry Road
Bala Cynwyd, PA 19004

Sweeney, Megan
Pennsylvania Department of State

Sykes, Shirley (testifying by video or trial preservation deposition)
1614 N. 62nd Street
Philadelphia, PA 19151

Toadvin, Mary
2824 N. Taney Street
Philadelphia, PA 19132

Wolosik, Mark
County Office Building
542 Forbes Avenue Room 604
Pittsburgh, PA 15219

*Petitioners reserve the right to supplement and modify this list. In addition, Petitioners reserve the right to designate additional witnesses to testify by video.

Applewhite, et al. v. Commonwealth of Pennsylvania, et al.
No. 330 MD 2012

EXHIBIT 3

Petitioners' Pre-Trial Statement And Application For Special Relief In The Nature Of A Preliminary Injunction

EXHIBIT 3

Applewhite et al. v. Commonwealth: Petitioners' Proposed Exhibits[1]

Previously Admitted Exhibits	
NUMBER	**EXHIBIT**
Pet'rs' Ex. 1	Photocopies of Wilola Shinholster's Identification Cards
Pet'rs' Ex. 2	November 9, 2010 Letter from the Georgia Department of Community Health Stating No Record of Birth Certificate had been Located for Wilola Shinholster
Pet'rs' Ex. 3	Photocopies of Viviette Applewhite's Identification Cards and Documents of Residency
Pet'rs' Ex. 4	Photocopy of Birth Certificate of Viviette Virene Brooks
Pet'rs' Ex. 5	Letter from Secretary Carol Aichele to Viviette Applewhite About Act 18
Pet'rs' Ex. 6	Ana Gonzalez's Birth Certificate Application for the Commonwealth of Puerto Rico and Photocopies of Gonzalez's Identification Cards and Residency Documents
Pet'rs' Ex. 7	Photocopies of Stanley Garrett's Department of Veteran Affairs Card
Pet'rs' Ex. 8	June 20, 2012 Letter from the North Carolina Department of Health and Human Services to Charles Pelletreau Stating it was Unable to Locate Any Record of a Birth Certificate for Stanley Leroy Garrett
Pet'rs' Ex. 9	May 2, 2012 Letter from the Commonwealth of Virginia Department of Health to Veronica Ludt Stating it was Unable to Locate Record of Birth for Laila Teresa Stones
Pet'rs' Ex. 10	June 19, 2012 Copy of Request for Laila Stones' Student Records from Face to Face to the School District of Philadelphia, Student Records Information Center
Pet'rs' Ex. 11	Video Deposition of Nadine Marsh
Pet'rs' Ex. 12	Documents from Nadine Marsh Video Deposition
Pet'rs' Ex. 13	Veronica Ludt Curriculum Vitae
Pet'rs' Ex. 14	Webshot of the Required Documents to Obtain a U.S. Social Security Card
Pet'rs' Ex. 15	July 12, 2012 Stipulation on In-Person Voter Fraud for Applewhite, *et al.* v. Commonwealth, *et al.*
Pet'rs' Ex. 16	Matt Barreto Curriculum Vitae
Pet'rs' Ex. 17	Appendix B of Matt Barreto Expert Report: Pennsylvania Voter Identification Study Survey Instrument
Pet'rs' Ex. 18	Appendix A of Matt Barreto Expert Report: Table of Result of Pennsylvania Voter ID
Pet'rs' Ex. 19	Pennsylvania Department of State FAQ titled "Pennsylvania's Voter ID Law,

[1] Petitioners reserve the right to amend and supplement this Exhibit List because, among other reasons, Respondents and their third-party vendors have recently produced and have agreed to continue to produce responsive documents. Although Petitioners have included exhibits related to expert reports which have previously been disclosed, Petitioners will supplement their exhibit list when they disclose expert reports on July 1, 2013 in accordance with the Court's May 28, 2013 Scheduling Order. By listing certain exhibits herein, Petitioners do not agree that the exhibits are admissible if offered by Respondents and reserve their right to object in whole or in part to these exhibits.

	A Guide to Act 18 of 2012"
Pet'rs' Ex. 20	June 12, 2012 Email from K. Kotula on the Department of State ID
Pet'rs' Ex. 21	June 27, 2011 Email from R. Oyler Estimating 99% of Pennsylvania's Eligible Voters that have a PennDOT-issued ID Card
Pet'rs' Ex. 22	June 18, 2012 Email from M. Sweeny on Voter ID Weekly Update
Pet'rs' Ex. 23	April 17, 2012 Face to Face Legal Center Freedom of Information Request for Gloria Cuttino birth records
Pet'rs' Ex. 24	Photocopy of Devra Schor's Identification Cards and Voter Registration Card
Pet'rs' Ex. 25	July 15, 2012 Stipulation Regarding Pennsylvania Department of Transportation Web Searches for Applewhite, *et al.* v. Commonwealth, *et al.* With Attached Exhibits
Pet'rs' Ex. 26	Maps of Pennsylvania Counties
Pet'rs' Ex. 27	April 4, 2011 Legislative Bill Analysis for House Bill 934
Pet'rs' Ex. 28	Safran MorphoTrust USA Contract with Pennsylvania Department of Transportation to Provide Pennsylvania Department of State Voter ID Card
Pet'rs' Ex. 29	July 16, 2012 Request for Pennsylvania Department of State ID and Affirmation
Pet'rs' Ex. 30	July 20, 2012 Request for Pennsylvania Department of State ID and Affirmation
Pet'rs' Ex. 31	Photocopies of Tia Sutter's Birth Certificate and Identification Card
Pet'rs' Ex. 32	Photocopies of Danny Rosa's Identification Cards, Documents of Residency and Identification Documents
Pet'rs' Ex. 33	Photocopies of Joyce Block's Identification Cards, Documents of Residency and Identification Documents
Pet'rs' Ex. 34	Video Deposition of Joyce Block
Pet'rs' Ex. 35	Photocopy of Joyce Block's Social Security Card
Pet'rs' Ex. 36	Summary of Backfill Project Match Results
Pet'rs' Ex. 37	July 3, 2012 Pennsylvania Department of State Press Release titled "Department of State and PennDOT Confirm Most Registered Voters Have Photo ID"
Pet'rs' Ex. 38	June 21, 2012 Email From D. Burgess on Inactive Voters
Pet'rs' Ex. 39	Photocopy of Beatrice Bookler's Voter Registration Card
Pet'rs' Ex. 40	Video Deposition of Beatrice Bookler
Pet'rs' Ex. 41	July 19, 2012 Stipulation on Authenticity of Video for Applewhite, *et al.* v. Commonwealth, *et al*
Pet'rs' Ex. 42	Video of Representative Turzai
Pet'rs' Ex. 43	May 31, 2012 Email from M. Sweeny with Care Facility Voter ID Template Attached
Pet'rs' Ex. 44	Photocopies of Lisa Gray's Identification Documents and Letter from Secretary Carol Aichele to Lisa Gray About Act 18
Pet'rs' Ex. 45	Pennsylvania Department of Transportation Application for Initial Photo Identification Card
Pet'rs' Ex. 46	Respondents' Amended Answer to Petitioners' First Set of Interrogatories, Interrogatory One for Applewhite, *et al.* v. Commonwealth, *et al.*
Pet'rs' Ex. 47	League of Women Voters Brochure, Titled "What's in Your Wallet"

Pet'rs' Ex. 48	Reverse Side of Appellants' Hearing Exhibit # 30, July 20, 2012 Request for Department of State ID and Affirmation Listing Exceptions
Pet'rs' Ex. 49	Doctor Lorraine C. Minnite's Curriculum Vitae
Pet'rs' Ex. 50	Doctor Lorraine C. Minnite's Expert Report
Pet'rs' Ex. 51	March 18, 2011 Letter From the County Commissioners Association of Pennsylvania to the Members of the House State Government Committee on the House State Government Committee Hearing on HB 934 and HB 647
Pet'rs' Ex. 107	Voter ID Process Refresher and Pennsylvania Department of State ID Training
Pet'rs' Ex. 115	Demonstrative of Pennsylvania Department of State Postcard Mailing
Pet'rs' Ex. 131	August 28, 2012 Email from J. Marks to Courtney Wolpert et al. on Department of State ID Card Verification Types; August 28, 2012 Email from Courtney Wolpert to J. Marks et al on Department of State ID Card Verification Types
Pet'rs' Ex. 136	Number of Initial Licenses and Initial Photo IDs Issued From March 15, 2011 Through September 19, 2011 and From March 15, 2012 Through September 19, 2012
Pet'rs' Ex. 139	Spreadsheet, Driver's License Center Customer Wait Times and Volumes
Pet'rs' Ex. 145	Harmelin Media Spreadsheet of 2012 General Election Media
Pet'rs' Ex. 149	Meeting Request for September 4, 2012 on Pennsylvania Department of State ID Card (Help Desk and Exceptions Handling)
Pet'rs' Ex. 172	August 13, 2012 Email from Gloria Blint to S. Royer et al. on Exterior/Interior Bus Cards
Pet'rs' Ex. 173	August 13, 2012 Email from Gloria Blint to S. Royer et al. on Outdoor Billboards
Pet'rs' Ex. 174	August 14, 2012 Email from Grace Calland to S. Royer et al. on Revised Layouts
Pet'rs' Ex. 178	August 7, 2012 Radio Script
Pet'rs' Ex. 179	August 9, 2012 Television Script
Pet'rs' Ex. 192	September 12, 2012 Email from K. O'Donnell to M. Sweeney on Potter County AAA Question
Pet'rs' Ex. 217	Resolved at Pennsylvania Department of State
Pet'rs' Ex. 218	Applications Whose Exceptions have not been Resolved at Department of State
Pet'rs' Ex. 220	August 14, 2012 Request for Initial Issuance of Pennsylvania Department of State ID for Voting Purposes
Pet'rs' Ex. 224	September 24, 2012 Amended Proposal for the Pennsylvania Department of State Voter ID Process
Pet'rs' Ex. 225	September 24, 2012 Request for Initial Issuance of Pennsylvania Department of State ID for Voting Purposes
Pet'rs' Ex. 226	September 24, 2012 Request for Replacement Pennsylvania Department of State ID for Voting Purposes
Pet'rs' Ex. 229	Documents Related to Eric Carney
Pet'rs' Ex. 232	September 25, 2012 Memorandum from G. Heffner to Jeff Holt et al. on Update to Department of State Voter ID Card Process
Pet'rs' Ex. 233	July 7, 2012 Letter From the Social Security Administration Related to Dorian

	Clark
Pet'rs' Ex. 234	Letter From the Social Security Administration Related to Dorian Clark
Pet'rs' Ex. 235	Declaration of Benny Scott
Pet'rs' Ex. 236	Declaration of Ronald Hartle
Pet'rs' Ex. 237	Forms given to Jessica Hockenbury at the Pennsylvania Department of Transportation Center in Pittsburgh, Pennsylvania
Pet'rs' Ex. 238	Affidavit of David Curry
Pet'rs' Ex. 239	September 26, 2012 Memorandum from Department of State, Bureau of Commissions, Elections and Legislature, Division of SURE to all Counties on SURE Help Desk

New Exhibits	
NUMBER	**PROPOSED EXHIBITS**
1000	Expert Report of Veronica Ludt
1001	Expert Report of Matt A. Barreto, Ph. D.
1002	Appendix D of Barreto Report: Curriculum Vitae of Dr, Gabriel R. Sanchez
1003	Lorraine C. Minnite, The Myth of Voter Fraud (Ithaca, New York: Cornell University Press, 2010)
1004	Memorandum from Douglas E. Hill to Pennsylvania House Members of the State Government Committee, dated March 18, 2011
1005	Legislative Journal, 195th Session of the General Assembly, June 20, 2011, June 21, 2011, June 23, 2011, and June 24, 2011, floor debates on HB 934, PN 1805
1006	Legislative Journal, 196th Session of the General Assembly, March 13, 2012, March 14, 2012, floor debates on HB 934, PN 3166
1007	Governor's Message, "Governor Corbett Signs Voter ID Bill to Require Photo Identification" (Mar. 14, 2012)
1008	Transcript, Commonwealth of Pennsylvania House of Representatives, State Government Committee, Hearing on House Bill 934 and House Bill 647, dated March 21, 2011
1009	8/2/11 Email to I. Harlow from S. Royer re: "A Few More Fraud Link" (PA-00000115)
1010	Kelly Cernetich, "Turzai: Voter ID Law Means Romney Can Win PA," PoliticsPA (June 25, 2012), available at http://www.politicspa.com/turzai-voterid-law-means-romney-can-win-pa/37153/
1011	8/10/11 Email to P. Dillon from S. Sikorski (forwarded to I. Harlow and others, responded to by Harlow) re: "Voter fraud" (PA-00000123-124)
1012	Transcript, Commonwealth of Pennsylvania House of Representatives, House Appropriations Committee, Public Hearing: Department of State, March 7, 2012
1013	Legislative Journal, 196th Session of the General Assembly, March 13, 2012, March 14, 2012, floor debates on HB 934, PN 3166
1014	Petition for Review Addressed to the Court's Original Jurisdiction (May 1, 2012)
1015	Petitioners' First Set of Interrogatories to Respondents (May 8, 2012)

1016	Spreadsheet of responses from county District Attorneys, as of July 6, 2012
1017	Petitioners' First Request for Production of Documents (May 8, 2012)
1018	Department of Justice's Ballot Access and Voting Integrity Initiative
1019	U.S. Congress, Senate Committee on the Judiciary, "To Enforce the 15th Amendment to the Constitution of the United States: Hearings on S.1564," 89th Cong., 1st sess., 1965
1020	U.S. Congress, House Committee on House Administration, "To Establish a Universal Voter Registration Program, and for Other Purposes: Hearings on H.R. 5400," 95th Cong., 1st sess., 1977
1021	U.S. Congress, House Committee on House Administration, Subcommittee on Elections, "Hearing on Voter Registration," 103rd Cong., 1st sess., January 26, 1993
1022	Craig C. Donsanto and Nancy L. Simmons, Federal Prosecution of Election Offenses, 7th ed., U.S. Department of Justice, Criminal Division, Public Integrity Section (Washington, D.C.: Government Printing Office, 2007)
1023	U.S. Department of Justice, "Fact Sheet: Protecting Voting Rights and Preventing Election Fraud" (Jul. 2, 2008), available at http://www.justice.gov/opa/pr/2008/July/08-crt-585.html
1024	State Representative Daryl Metcalfe, "Metcalfe Legislation to Combat Voter Fraud with Valid Photo ID Green-Lighted for House Consideration," Press Release, available at http://repmetcalfe.com/NewsItem.aspx?NewsID=11314
1025	Commonwealth of Pennsylvania, Legislative Journal, 195th General Assembly, 2011 Regular Session, No. 47, June 20, 2011, 26
1026	Governor of Pennsylvania, "Governor's Message," 196th General Assembly, 2012 Regular Session, March 14, 2012
1027	Data set produced by the Administrative Office of the United States Courts that is available to researchers through the ICPSR (Inter-University Consortium for Political and Social Research)
1028	U.S. Department of Justice, press conference, Washington, D.C., March 7, 2001, available at http://www.justice.gov/archive/ag/speeches/2001/0307civilrightspressconf.htm
1029	U.S. Congress, House Committee on House Administration, "Hearing on 'You Don't Need Papers to Vote?': Non-Citizen Voting and ID Requirements in U.S. Elections," 109th Congress, 2nd Sess., June 22, 2006, 245-54
1030	U.S. Department of Justice, Criminal Division, Public Integrity Section, "Election Fraud Prosecution and Convictions: Ballot Access and Voting Integrity Initiative, Oct. 2002 - Sept. 2005, n.d.
1031	Letter from LCCR and sign-on groups to John D. Ashcroft,, October 25, 2002
1032	Paula Ward, "Ex-Sheriff Pleads Guilty to Macing: DeFazio Admits to Coercing Employees Into Contributing to His Campaign Fund," Pittsburgh Post-Gazette, November 22, 2006.
1033	Federal Judicial Center, Federal Court Cases: Integrated Database, 1997, 2005 [computer file], conducted by the Federal Judicial Center, ICPSR04306, ICPSR04382, Ann Arbor, Mich.: Inter-University Consortium for Political and

	Social Research
1034	"Final Judgment Dismissing Election Contest with Prejudice and Confirming Certification of Election of Christine Gregoire," Timothy Borders, et al. v. King County et al., Case No. 05-2-00027-3, Superior Court of the State of Washington for Chelan County, June 24, 2005
1035	Letter from Marci Andino, Executive Director, South Carolina Election Commission to The Honorable Alan Wilson, Attorney General of South Carolina, dated February 22, 2012
1036	Associated Press, "South Carolina Attorney General Informs Justice Department of Voter Fraud," Augusta Chronicle (Jan. 21, 2012), available at http://chronicle.augusta.com/news/government/elections/2012-01-21/southcarolina-attorney-general-informs-justice-department
1037	Brief on Behalf of Plaintiff Democratic National Committee in Opposition to Defendant Republic (sic) National Committee's Motion to Vacate or Modify the Consent Decree, Democratic National Committee v. Republican National Committee, Civil Action No: 81-3876 (D.N.J., 2009)
1038	Felipe Kohn, "The United States Postal Service Undeliverable Rates for Census 2000 MailOut Questionnaires," Census 2000 Evaluation A.6.a, April 10, 2003, 10
1039	John Chesnut, "Study of the U.S. Postal Service Reasons for Undeliverability of Census 2000 Mailout Questionnaires," Final Report, Census 2000 Evaluation A.6.b, U.S. Census Bureau, September 30, 2003, iv
1040	Miriam Rosenthal, "Urban Update/Leave," Final Report, Census 2000 Evaluation F.11, U.S. Census Bureau, October 3, 2002, v
1041	Committee of Seventy, "Philadelphia Voter Registration Totals 1967-2011"
1042	Robert Tanner, "Flood of New Voters Signing Up," Associated Press (Sept. 28, 2004)
1043	Pennsylvania Department of State, VotesPA website, "Voting by Absentee Ballot," available at http://www.votespa.com/portal/server.pt?open=514&objID=1174088&parentname=ObjMgr&parentid=7&mode=2
1044	William T. McCauley, "Florida Absentee Voter Fraud: Fashioning an Appropriate Judicial Remedy," University of Miami Law Review 54(3): 625-64
1045	Joni James, "Voter Fraud Charges Collapse," St. Petersburg Times (Dec. 15, 2005), available at http://www.sptimes.com/2005/12/15/State/Voter_fraud_charges_c.shtml
1046	Expert Report of Amanda W. Bergson-Shilcock
1047	Curriculum Vitae of Amanda W. Bergson-Shilcock
1048	U.S. Census Bureau, American Community Survey 2006-10
1049	Pennsylvania Department of Transportation Identification and Residency Requirements For U.S. Citizens, available at www.dmv.state.pa.us/pdotforms/fact_sheets/pub195us.pdf
1050	U.S. State Department announcement "New Requirement for Puerto Rican Birth Certificates," available at www.travel.state.gov/passport/passport_4807.html
1051	U.S. Department of State, Processing Times for Passports, available at

	http://travel.state.gov/passport/processing/processing_1740.html
1052	Government of Puerto Rico Department of Health Birth Certificate Application by Mail Form, available at https://serviciosenlinea.gobierno.pr/Salud/Solicitudnac.pdf
1053	Government of Puerto Rico Department of Health website regarding applying for birth certificates, available at https://serviciosenlinea.gobierno.pr/SALUD/Servicios.aspx?goto=nacimiento
1054	U.S. Department of State, New Requirement for U.S. Birth Certificates, available at http://travel.state.gov/passport/passport_5401.html
1055	U.S. Citizenship and Immigration Services ELIS, available at http://www.uscis.gov/uscis-elis
1056	U.S. Citizenship and Immigration Services Processing Time Information, available at https://egov.uscis.gov/cris/processTimesDisplayInit.do
1057	Expert Report of Michelle Levy
1058	Deposition of Ian Harlow, dated June 28, 2012
1059	5/4/12 Email to S. Royer, D. Burgess and J. Marks from I. Harlow attaching a "DOH Cancellation with Vote" spreadsheet (PA-00000113-114)
1060	6/14/12 Email to P. Geho and S. Royer from I. Harlow re: "HB 934 HAVA Funds" (PA-00005559-5560)
1061	4/9/12 Email to J. Marks et al. from R. Ruman re: "For those with expired licenses" (PA-0006849-6850)
1062	4/17/12 Email to S. Royer et al. from J. Marks re: "Voter ID reply to Stephanie Singer" (PA-00037815-37816)
1063	3/15/12 Email to S. Royer et al. from J. Marks re: "Follow-up re: New Voter ID Law" (PA-00047401- 47402)
1064	4/30/12 Email to J. Marks and I. Harlow from S. Royer re: "November Election" (PA-00022222)
1065	4/9/12 Email to I. Harlow et al. re: "Voter ID" (PA-00022571-22574)
1066	4/25/12 Email to S. Royer et al. from P. Geho re: "voter id - post election assessment" (PA-00032264-32265)
1067	Deposition of Marina Matthew, dated June 27, 2012
1068	Deposition of Marina Matthew, dated June 28, 2012
1069	Applewhite et al. v. Commonwealth, Notice of Deposition for Department of Health designee(s) (June 18, 2012)
1070	4/10/12 Email to A. Baker from M. Matthew re: "voter ID" (PA-00027939-941)
1071	5/30/12 Email to R. Romanofsky et al. from Marina Matthew re: "Voter ID B/C forms" (PA-00027951)
1072	5/8/12 Email to J. Dolan et al. from M. Matthew attaching Request for Certification of Birth Record for Voter ID Purposes Only (PA-00028025-26)
1073	4/5/12 Email to Terry DiNardo and Cathy Sabol from Debra Romberger re: "Birth certificates for VOTER ID - UPDATE" (PA-00028065)
1074	5/29/12 Memorandum to Eli Avlia from Anne Baker re: "BiMonthly Report of Activities from May 15th thru May 30th, 2012" (PA-00028103-28109)
1075	3/22/12 Email to A. Baker et al. from S. Royer re: "Birth certificates - voter

	ID" (PA-00028114-28115)
1076	3/28/12 Email to A. Baker et al. from H. Senior re: "Newspaper Link" (PA-00028171-28173)
1077	4/16/12 Email to Allison Taylor from healtheo@state.pa.us attaching an application for a certified birth record (PA-00028183-84)
1078	5/23/12 Email to D. Heckert and D. Romberger from M. Marina re: "REFUND of BC fee for a Photo ID" (PA-00028281-28284)
1079	4/5/12 Email to A. Baker et al. from M. Matthew re: "voter id" (PA-00028357)
1080	6/1/12 Letter to Personal Care Home Operators from the Department of Welfare regarding the Voter ID law and attaching a template for ID (PA-00079220- 221)
1081	Pennsylvania Department of State document of frequently asked questions regarding the use of a care facility ID to vote in person (PA-00034284-288)
1082	Pennsylvania Department of Health website regarding obtaining birth and death certificates, available at http://www.portal.state.pa.us/portal/server.pt/community/birth_and_death_certificates/11596
1083	Pennsylvania Department of Health website providing answers to frequently asked questions regarding birth certificates (PA-00004990-991)
1084	Pennsylvania Department of Health website discussing obtaining a birth certificate for Voter ID, available at http://www.portal.state.pa.us/portal/server.pt/community/voter_id/20978
1085	Pennsylvania Department of Health website discussing the process by which one may request a birth certificate online, available at http://www.portal.state.pa.us/portal/server.pt/community/birth_certificates/14121/birth_records_-_by_internet/556818
1086	Pennsylvania Department of Health website discussing the process by which one may request a birth certificate by mail, available online at http://www.portal.state.pa.us/portal/server.pt/community/birth_certificates/14121/birth_records_-_by_mail/556813
1087	Pennsylvania Department of Health form for individuals seeking a birth certificate who do not possess an acceptable Government-issued photo ID (PA-00054064)
1088	Deposition of Jonathan Marks, dated June 29, 2012
1089	Pennsylvania Voter Registration Mail Application (PA-00048645-48647)
1090	Email dated 4/3/12 to S. Royer et al. from R. Oyler re: "Requirements of new Voter ID Law" (PA-00000397)
1091	Email dated 5/2/12 to P. Geho et al. from J. Marks re: "license" (PA-00000657-659)
1092	Pennsylvania Department of State memorandum dated 5/12/12 to county election contacts from J. Marks re: "Voter ID" (PA-00010074-10075)
1093	Pennsylvania Department of State PA's voter ID law guide (PA-00022300-22306)
1094	Voter ID Legislation post-enactment action plan (PA-00036543-36547)
1095	Email dated 1/20/12 to M. Sweeney from S. Royer re: "Voter ID Implementation" and attaching Pennsylvania Department of State and

	Pennsylvania Department of Transportation Voter ID implementation documents (PA-00047460, PA-00047461-65, PA-00047466)
1096	Deposition of David Burgess, dated July 10, 2012
1097	4/20/12 Email to Randy Trutt et al. from I. Harlow re: "DL Backfill" and attaching an 8/19/11 Project Scope Statement for the Driver's License "Backfill" Project (PA-00020635-20642)
1098	6/22/12 Email to S. Royer et al. from I. Harlow re: "PennDOT - DOS Analysis" and attaching a memorandum regarding the same and county breakout information (PA-00056557-56560)
1099	6/21/12 Pennsylvania Department of State draft memoranda from I. Harlow to S. Royer re: "PennDOT/ DOS Data Analysis" with handwritten notes (PA-00056564-56568)
1100	6/14/12 Email to C. Arulkumaran et al. from T. Ruppert re: "DOS/PennDOT Backfilling" (PA-00056594-56598)
1101	Handwritten notes from a 6/21/12 meeting regarding Pennsylvania Department of State issued ID for the purposes of voting (PA-00062313-62323)
1102	5/25/12 Email to D. Burgess et al. re: "Updated Sprint 3 Test Case Stats" and attaching a test results summary (PA-00063881-63886)
1103	6/21/12 Email to J. Marks and S. Royer from I. Harlow re: "Printing Voter ID Notifications and Envelopes" and attaching spreadsheet of costs (PA-00070847-49)
1104	Document showing the number of records with and without matches (PA-00077281)
1105	6/22/12 Email to C. Arulkumaran et al. from I. Harlow re: "CSV file for DOS mailing" (PA-00078553)
1106	Deposition of Secretary of State Carol Aichele, dated July 10, 2012
1107	4/20/12 Email to K. Myers et al. from C. Aichele re: "PA voter ID -- experience with my 94 year-old mother and her 95-year old friend" (PA-00028534-525)
1108	4/20/12 Email to S. Royer et al. from C. Aichele re: "PA voter ID -- experience with my 94 year-old mother and her 95-year old friend" (PA-00028536-37)
1109	Affidavit in Support of Exemption for Sincerely Held Religious Beliefs (PA-00031870-31873)
1110	Email dated 6/22/12 to M. Sweeney from M. Weglos re: "Colleges" (PA-00078570)
1111	Applewhite et al. v. Commonwealth of Pennsylvania, Notice of Deposition for Pennsylvania Department of State designee(s) (June 18, 2012)
1112	Pennsylvania Department of State website providing Carol Aichele's biography, available at http://www.portal.state.pa.us/portal/server.pt?open=514&objID=571783&mode= 2
1113	Deposition of S. Royer, dated July 10, 2012
1114	Deposition of S. Royer, dated July 9, 2012
1115	3/28/12 Email to R. Ruman from O. McEvoy (forwarded to S. Royer) attaching spreadsheet on "Voting Irregularities in Pennsylvania." (PA-00000116-19)

1116	5/4/12 Email to C. Aichele et al. from S. Royer re: "I See Dead People" and attaching "DOH Cancellation with Vote" spreadsheet. (PA-00000120-22)
1117	5/2/12 Email to C. Aichele and J. Marks from S. Royer re: "ID for Voting Purposes" (PA-00000213-216)
1118	5/9/12 Email to S. Royer, R. Ruman and M. Sweeney from P. Geho re: "Voter ID" (PA-00000220-221)
1119	4/23/12 Email to S. Royer et al. from P. Geho re: "Inquirer editorial today - Voter ID" (PA-00031987- 31988)
1120	5/11/12 Email to S. Royer et al. from M. Sweeney re: "Letter to the Editor in today's Patriot" (PA-00031992)
1121	4/19/12 Email to R. Ruman and M. Sweeney from S. Royer re: "PA voter ID -- experience with my 94 year-old mother and her 95-year old friend" (PA-00032128)
1122	5/4/12 Email to S. Royer and M. Sweeney from J. Marks re: "Voter ID Problem" (PA-00056687-56689)
1123	6/20/12 Email to S. Royer and J. Marks from I. Harlow re: "PennDOT, DOS and the weekend" (PA-00061749)
1124	6/12/12 Email to C. Aichele, Evelyn Walker, M. Weglos and Barbara Smotherman from S. Royer re: "Hot List Update" (PA-00062429)
1125	6/21/12 Email to S. Royer et al. from P. Geho re: "More Voter Fraud" and attaching a news article (PA-00070839-70842)
1126	6/15/12 Email to M. Sweeney from Michelle Weglos re: "Questions Attached" and attaching voter ID implementation questions for other states (PA-00079312-79313)
1127	6/19/12 Email to S. Royer from M. Sweeney discussing "Today's Meeting" (PA-00079356-79357)
1128	6/15/12 Email to S. Royer et al. from M. Sweeney re: "Number of IDs issued by PennDOT as of 6/14" (PA-00081291)
1129	Form letter to voters from C. Aichele providing information regarding the type of ID that is acceptable for the purposes of voting, and the methods by which such IDs may be obtained
1130	Draft of application form for affirmation of initial issuance Pennsylvania Department of State ID for the purposes of voting
1131	Deposition of Bryan Kendro, dated July 11, 2012
1132	Legislative bill analysis of the voter ID law dated 5/16/11 (PA-0005361-5362)
1133	Chart of voter registration rates in various states, taken from, "The Impact of the National Voter Registration Act, 2009-2010" (PA-0005547)
1134	4/5/12 Email to B. Kendro et al. from R. Oyler re: "voter ID" (PA-00052126-52127)
1135	6/21/11 Email to J. Dolan et al. from K. Myers re: "HB 934" and attaching "HB 934 Fiscal Note Backup" (PA-00053083-53085)
1136	5/17/11 Email to Eric Dice et al. from K. Myers re: "Data Request: House Appropriations Committee (D)" (PA-00054269-54272)
1137	Applewhite et al. v. Commonwealth of Pennsylvania, Notice of Deposition for Pennsylvania Department of Transportation designee(s), dated 6/18/12

1138	Deposition of Rebecca Oyler, dated July 9, 2012
1139	2/2/12 Email to M. Weglos, S. Royer, P. Geho and M. Sweeney re: "photo ID, elderly requirement and turnout" (PA-00005062- 5064)
1140	3/22/12 Email to D. Burgess from R. Oyler re: "Voter ID" (PA-00015015-00015019)
1141	4/3/12 Email to M. Sweeney from R. Oyler re: "Resources for presentation" (PA-00032176-32178)
1142	5/12/12 Email to M. Weglos from R. Oyler re: "Articles/examples of absentee fraud" (PA-00048812)
1143	Deposition of Ronald Ruman, dated June 28, 2012
1144	12/20/11 Email to S. Royer et al. from R. Oyler re: "Interesting case/article" (PA-00004975-76)
1145	12/22/11 Email to S. Royer, P. Geho, R. Ruman, J. Marks and M. Weglos from R. Oyler re: "New York Voter Fraud Case" (PA-00004980-4981)
1146	11/21/11 Email to R. Ruman from J. Mathis re: "provisional ballots" (PA-00004974)
1147	3/7/12 Email to S. Royer and P. Geho from R. Ruman re: "Voter turnout information" and attachment (PA-00005069; PA-00005131-5141)
1148	3/8/12 Email to B. Dupler from R. Ruman re: "PR plan for voter ID" and attaching a marketing proposal for the voter ID law (PA-00007123-7125)
1149	Pennsylvania Department of State document dated 4/3/12 on the education and implementation of the voter ID law (PA-00007138-7158)
1150	Pennsylvania Department of State's marketing proposal for the voter ID law (PA-00007166-7167)
1151	Fact sheet from the Appropriations Committee Budget Hearings Fast Facts from the Bureau of Commissions, Elections and Legislation about voter registration, Help America Vote Act statistics, the SURE system and lobbyists (PA-00007212- 7214)
1152	Fact sheet from the Appropriations Budget Hearings Bureau of Commissions, Elections and Legislation Overview, outlining the funds available (PA-00007215-7217)
1153	Memorandum from the Pennsylvania Department of State 2012 Budget Appropriations Hearings, Office of Communications and Press discussing voter outreach and education efforts (PA-00007258-7261).
1154	3/29/12 Email to S. Royer from R. Ruman re: "voter fraud "and attachment (PA-00000116-117, PA-0000118-19)
1155	3/22/12 Email to B. Dupler from S. Royer re: "Talking Points" (PA-00007111)
1156	Voter ID project plan. (PA-00007094-7110)
1157	4/18/12 Email to S. Royer et al. from R. Ruman re: "News conference" (PA-0006856-57)
1158	Pennsylvania Department of State's VotesPA website
1159	Deposition of Kurt Myers, dated June 27, 2012
1160	Applewhite et al. v. Commonwealth, Notice of Deposition, Myers individual capacity (June 6, 2012)
1161	6/28/11 Email to P. Geho et al. from R. Ruman re: "Cost analysis" (PA-00051231)

1162	Conference call reminder with hand written notes regarding the process of obtaining a birth certificate for the purposes of voting (PA-00052202-52203)
1163	Email between K. Myers, and G. Kaskie from K. Templeton re: "HOT!! Data request for Kurt" (PA-00052246-52247)
1164	4/18/12 Email to S. Royer et al. from K. Myers re: "Another Voter ID question" and attachment (PA-00053985- 53987, PA-00053988)
1165	3/28/12 Email to D. Smith et al. from K. Myers re: "Voter ID Update" attaching documents on Voter ID-expired products (PA-00054046-54048)
1166	6/28/11 Email to K. Myers et al. from B. Kendro re: "FN on HB 934" (PA-00054165-67)
1167	4/20/12 Email to B. Kendro et al. from K. Myers re: "Hours of Operation" and attachment (PA-00054264-54265)
1168	Pennsylvania House Committee on Appropriations Fiscal Note Conference Committee Report dated 2/14/06
1169	Pennsylvania Department of Transportation website listing of Pennsylvania Department of Transportation Photo & Exam Centers
1170	Pennsylvania Department of Transportation website discussing the new voter ID law
1171	Affirmation that voter does not possess proof of identification for voting purposes (PA-00054062)
1172	Documents related to Danny Rosa
1173	Pennsylvania Department of Transportation Memorandum dated 11/9/09 regarding the birth certificate exception process
1174	Pennsylvania Department of State, "Secretary of Commonwealth Announces Simplified Process for Obtaining Voter ID, Reminds Voters Photo ID Not Required for April 24 Primary" (Apr. 18, 2012) (PA-00036026-36027)
1175	Pennsylvania Department of State, "Secretary of Commonwealth Announces Simplified Method to Obtain Photo ID for Pennsylvania-Born Voters" (May 23, 2012) (PA-00053971-53972)
1176	"Corbett Administration limits discussion on voter ID," Philly.com (June12, 2012), available at http://www.philly.com/philly/news/politics/158450406.html
1177	Deposition of Kurt Myers Day 2, dated July 18, 2012
1178	4/18/12 Email to I. Harlow from D. Burgess re: "Voter records without DL or SSN" and attached spreadsheet (PA-00005046-5049)
1179	Deposition of Jonathan Marks Day 2, dated July 19, 2012
1180	Letter from Robert Melusky, Dir., Adult Residential Licensing, Pa. Dep't of Public Welfare, to Personal Care Home Operators (June 1, 2012)
1181	Documents and videos related to identification, interviews and voting history produced by Viviette Applewhite (VOTE-00000001, VOTE-00000018, VOTE-00000020, VOTE-00000110-116, VOTE-00001811-813)
1182	Documents and videos related to identification, interviews and voting history produced by Joyce Block (VOTE-00000003, VOTE-00000019, VOTE-00000021-33, VOTE-00001813)
1183	Documents and videos related to identification, interviews and voting history produced by Beatrice Bookler (VOTE-00000004, VOTE-00001812)

1184	Documents related to the identification, interviews and voting history produced by Gloria Cuttino (VOTE-00000005, VOTE-00000034-47)
1185	Document related to the voting history produced by Henrietta Kay Dickerson (VOTE-00000006)
1186	Documents related to identification, interviews and voting history produced by Wilola Shinholster Lee (VOTE-00000008, VOTE-00000056-110, VOTE-00000117)
1187	Documents related to identification, interviews and voting history produced by Nadine Marsh (VOTE-00000009-014)
1188	Documents related to identification, interviews and voting history produced by Asher Schor (VOTE-00000015-17)
1189	Documents related to Voter ID education produced by the League of Women Voters of PA (VOTE-00000118-01802)
1190	Documents related to Voter ID produced by HAP (VOTE-00001803-810)
1191	Documents related to Voter ID produced by the NAACP (VOTE 00001814 - 01907)
1192	Subpoena responses by Pennsylvania District Attorneys (VOTE-00001908-02024)
1193	Documents related to Ana Gonzalez (VOTE-00002025-043)
1194	Map of Department of Motor Vehicle centers and polling locations
1195	List of Pennsylvania Department of Transportation Driver and Vehicle Services - Service Centers, available at https://www.dot3.state.pa.us/locator/AmsServlet.jsp#top?20120717071739162=20120717071739162
1196	Locations of Pennsylvania Department of Transportation Driver and Vehicle Services, available at https://www.dot3.state.pa.us/locator/locator.jsp#top?20120717071738849=20120717071738849
1197	Chart of Pennsylvania Department of State and Department of Transportation website changes relating to Voter ID and supporting website snapshots
1198	Pennsylvania House of Representatives Roll Call for House Bill 934 PN 3166, available at http://www.legis.state.pa.us/CFDOCS/Legis/RC/Public/rc_view_action2.cfm?sess_yr=2011&sess_ind=0&rc_body=H&rc_nbr=1210
1199	Senate of Pennsylvania Roll Call for House Bill 934 PN 3166, available at http://www.legis.state.pa.us/CFDOCS/Legis/RC/Public/rc_view_action2.cfm?sess_yr=2011&sess_ind=0&rc_body=S&rc_nbr=555
1200	Voter ID PSA video from "votespa.com," available at http://www.youtube.com/watch?v=RrxRow4j2JQ&feature=youtu.be
1201	Voter ID PSA video from "votespa.com," available at http://www.youtube.com/watch?v=HBQhp7dUkGE&feature=youtu.be
1202	3/26/12 Email to K. Myers and J. Dolan from S. Royer attaching "County Voter ID handout 3-21-12" (PA-00000247-249)
1203	Email dated 4/18/12 to S. Singer et al. from J. Marks re: "IMPORTANT INFORMATION: Voter ID Law" (PA-00000600-605)
1204	Email dated 5/10/12 to I. Harlow et al. from Randy Trutt attaching "Project

	Scope for DL Backfill rko" (PA-00000992-998)
1205	Email dated 4/23/13 to J. Dolan et al. from Randy Trutt re: "Voter Id/DOS request for information" (PA-00001474-76)
1206	May 20, 2011 Email chain between R. Myers, R. Oyler, and others re: "HB934 Cost Estimate - Pennsylvania Department of Transportation" and attaching U.S. Census Bureau 2005-2009 data for Pennsylvania (PA-00005163-65)
1207	Undated email and HB934 Fiscal Note with handwriting on it regarding costs of implementing Voter ID (PA-00005174-76)
1208	3/20/12 Email from K. Myers attaching "DriversLicenceArea-DistancesFinal," "Affidavit is Support of Exemption for Sincerely Held Religious Beliefs," and "call center questions" (PA-00005238-39, PA-00005240-297, PA-00005298-5301, PA-00005302)
1209	12/8/11 Email to G. Reinard from R. Oyler attaching "HB 934 Fiscal Note Backup" and "HB 934 Fiscal Note Backup REVISED 11.30" (PA-00005303, PA-00005304-05, PA-00005306-07)
1210	5/1/12 Email from S. Royer to C. Aichele attaching "HAVAGrant BalanceMemo04132012" (PA-00005352-53, PA-00005354)
1211	Letter dated 10/21/11 to S. Crary from S. Royer (PA-00007161-62)
1212	Photo ID Appropriations Hearings Talking Points (PA-00007164-65)
1213	4/13/12 Email chain between R. Oyler, N.Winkelman, and others re: "Voter ID" (PA-00015064-70)
1214	5/8/12 Email from Susan Keller to Jessica Mathis, copying Marcia Garrell re: "Seniors trying to obtain Photo ID's" (PA-00022207)
1215	"Questions and discussion items for meeting with DOS, March 27, 2012" (PA-00022209-212)
1216	4/12/12 Email between C. Csinicsek and J. Mathis re: "Voter ID" (PA-00022567-68)
1217	4/18/12 Email from N. Winkelman to C. Cashman and C. Mowad (forwarded to others) attaching Affirmation (PA-00031661-62, PA-00031663)
1218	5/17/12 Email from L. Kulp to Senator Bob Mensch (forwarded to P. Geho et al.) re: "Contact Your State Officials" (PA-00031774-77)
1219	5/10/12 Email to T. Graham from M. Sweeney re: "Voter ID" (PA-00036577)
1220	Voter ID "To-Do List" dated 5/2/12 (PA-00037776-77)
1221	5/1/2012 Email from M. Sweeney to multiple recipients re: "Voter ID Provisional Ballot Question" (PA-00037808)
1222	4/25/12 Email from T. Graham to M. Sweeney re: "Voter ID question" (PA-00037809)
1223	"Requirements of new Voter ID Law (Act 18 of 2012)" (PA-00042802-809)
1224	4/2/12 Email chain between S. Royer, R. Oyler, R. Ruman, and M. Sweeney re: "Voter ID and Revenue" (PA-00047482- 85)
1225	5/4/12 Email to M. Matthew et al. from J. Dolan re: "Birth Cert" and attachments (PA-00048619, PA-00048620-21, PA-00048622, PA-00048623)
1226	5/9/12 Email chain between I. Harlow, R. Trutt, M. White et al. re: "Voter ID/DOS Request for Information Follow Up from April 26th Meeting" and attachments (PA-00048650-52, PA-00048653, PA-00048654)
1227	3/19/12 Email between S. Royer, K. Kotula, R. Ruman, and others re: "Name

	Changes" (PA-00049454-55)
1228	3/2/12 Email between G. Kaskie, K. Ralls, R. McDonald, and J. Bowser re: "Data Request" (PA-00052477)
1229	5/13/11 Email between T. Popp, K. Myers, K. Templeton, et al. re: "Data Request: House Appropriations Committee (D)" (PA-00052991-94)
1230	3/22/12 Email from G. Kaskie to K. Templeton (forwarded to K. Myers) re: "Fee Waiver 27 for 3/21/12" and attachment (PA-00053065, PA-000053066)
1231	10/25-26/11 Email between G. Kaskie, K. Templeton, and others re: "Questions re: Photo ID bill" (PA-00053727-29)
1232	10/25-26/11 Email between J. Dolan, K. Templeton, K. Myers, and others re: "Questions re: Photo ID bill" (PA-00053737-38)
1233	9/2/11 Email between K. Templeton, J. Dolan, S. Shenk, T. Popp, and others re: "Reporter Inquiry: % of Registered Voters with ID" (PA-00053750-51)
1234	4/18/12 Email between K. Myers, C. Cashman, J. Dolan, S. Shenk, and P. Gnazzo re: "Another Voter ID question" (PA-00054066-69)
1235	5/21-24/12 Email between S. Shenk, C. Cashman, J. Dolan, and others re: "PHOTO IDENTIFICATION FOR THE HOMELESS" (PA-00054102)
1236	4/3-4/12 Email between J. Murzyn, K. Myers, and others re: "Voter ID/PennDOT ID" (PA-00054144-45)
1237	3/5/12 Email between K. Myers, C. Cashman, J. Murzyn, and others re: "HB 934 - Voter ID" (PA-00054282-84)
1238	4/19/12 Email from R. Beatty (forwarded by S. Shenk) re: "Voter I.D. update" and attaching "Voter ID_Expired" (PA-00054467-68, PA-00054469)
1239	3/28/12 Email between R. Johnson, T. Warren, S. Rumbaugh, J. Stone, and D. Mengel re: "Voter IDs" (PA-00054488)
1240	Correspondence between R. Loughery and the Pennsylvania Department of State regarding Veterans IDs without expiration dates (PA-00055179-184)
1241	"Follow-Up for May 23, 2012 WebEx Meeting for Voter ID Law" (PA-00055248-251)
1242	6/12/12 Email from J. Marks to county election officials re: "COUNTY VOTER ID QUESTION - Share the Response" (PA-00055258-260)
1243	5/24/12 Email from J. Greenburg to county election officials and others (forwarded by J. Holjes) re: "Voter ID Discussion 1" and the 511 Shared Ride information (PA-00055401-04)
1244	6/19/12 Email from N. Yingst to J. Holjes (forwarded to J. Marks) re: "Photo ID Question - 'Substantially conform'" (PA-00055503)
1245	6/12/12 Email from R. Smithkors to J. Marks, J. Mathis, S. Seitz, and A. Yake re: "Problem" (PA-00055643)
1246	4/18/12 Email from J. Marks to S. Singer, G. Irving, J. Lynch, and E. Bruhl re: "IMPORTANT INFORMATION: Voter ID Law" (PA-00055760-65)
1247	6/6/12 Email from J. Inferrera to P. Geho (forwarded to S. Royer, et al.) re: "Voter ID issue at Bedford DLC" (PA-00055837-38)
1248	5/15-25/12 Email between J. Marks, S. Singer, and others re: "readily distinguishable" (PA-00056015-19)
1249	5/16/12 Email to J. Holjes from M. Medalis re: "Voter ID" (PA-00056244)
1250	6/21/12 Email to K. Kotula, S. Clemmer, and J. Marks from I. Harlow re:

	"SSN" (PA-00056743)
1251	Voter ID Report dated 6/15/12 from M. Sweeney to S. Royer (PA-00061768-772)
1252	6/12/12 Email from C. Miller to I. Harlow et al. re: "Department of State (DOS) ID Requirements" (PA-00062280, PA-00062281, PA-00062282)
1253	Provisional Ballot Certified Results from the 2010 General Election (PA-00064028-030)
1254	6/21/12 Email between I. Harlow and C. Arulkumaran re: "match universe" (PA-00071552)
1255	6/1/12 Email from D. VanBourgondien to R. Waterman and J. Marks re: "Voter ID at Riddle Village" and attaching care facilities documents (PA-00077678-680, PA-00077681, PA-00077682, PA-00077683-698)
1256	Documents relating to letter to registered voters without Pennsylvania Department of Transportation ID (PA-00078554-58)
1257	Letter dated 6/14/12 to Governor Tom Corbett from Representative Eddie Day Pashinski (PA-00078562-63)
1258	Task list dated 6/18/12 (PA-00078810-865)
1259	6/6/12 Email to M. Sweeney from P. Caimano re: "Dept of Veterans Affairs" and attachment (PA-00079195, PA-00079196)
1260	6/13/12 Email to P. Dillon from S. Boyle (forwarded to others) re: "Constituent Inquiry -- Voter ID" (PA-00079236-37)
1261	6/11-13/12 Email chain between C. Arulkumaran, I. Harlow, Randy Trutt, and others re: "DOS/PennDOT Backfilling" (PA-00079694-96)
1262	6/1/12 Voter ID Report from M. Sweeney to S. Royer (PA-00080140-143)
1263	6/11/12 Voter ID Report from M. Sweeney to S. Royer (PA-00081000-004)
1264	Pennsylvania Department of State, "Department of State and PennDOT Confirm Most Registered Voters Have Photo ID" (July 3, 2012)
1265	Pennsylvania Budget and Policy Center, "New Data Suggest Hundreds of Thousand Could be Disenfranchised by Pennsylvania's Voter ID Law" (Jul. 6, 2012), available at http://pennbpc.org/new-data-suggest-hundreds-thousands-could-be-disenfranchised-pennsylvania%E2%80%99s-voter-id-law
1266	Identification and Residency Requirements for U.S. Citizens, www.dmv.state.pa.us/ pdotforms/fact_sheets/ pub195us.pdf
1267	Centers for Disease Control and Prevention/National Center for Health Statistics, U.S. Vital Statistics System: Major Activities and Developments, 1950-95 at 10- 11 (1997)
1268	Pennsylvania Department of Transportation, Driver & Vehicle Services, Locations Info Center, available at http://www.dmv.state.pa.us/centers/locationsCenter.shtml
1269	New Voter ID Law, Pennsylvania Department of Transportation, http://www.dmv.state.pa.us/voter/voteridlaw.shtml (current application for PennDOT non-driver photo ID)
1270	"Voting by Alternative Ballot," available at http://www.portal.state.pa.us/portal/server.pt?open=514&objID=1174089&parentname=ObjMgr&parentid=194&mode=2
1271	Pennsylvania Department of State, "Pennsylvania Secretary of Commonwealth:

	Photo ID Protects Integrity of Every Vote" (Aug. 23, 2011), available at http://www.bizjournals.com/prnewswire/press_releases/2011/08/23/DC56264
1272	Pennsylvania Department of State, "Department of State Reminds Candidates of Petition Filing Deadlines for Primary Election" (Feb. 13, 2012)
1273	Marc Levy,"Voter ID bill nears end of debate in Pa. House" (Mar. 12, 2012) available at http://www.chron.com/news/article/Voter-ID-bill-nears-end-of-debate-in-Pa-House-3399666.php
1274	Pennsylvania Department of State, "March 26 is Deadline to Register to Vote in Pennsylvania Primary" (Mar. 19, 2012)
1275	"Aichele defends voter ID law," The Tribune-Democrat (Apr. 4, 2012), available at http://tribune-democrat.com/local/x611942632/Aichele-defends-voter-ID-law
1276	John Guerriero, "Aichele visits Erie to promote states new voter ID law," Erie Times-News (Apr. 6, 2012), available at http://www.goerie.com/article/20120406/NEWS02/304059870/Aichele-visits-Erie to-promote-state%27s-new-voter-ID-law
1277	"Secretary of the Commonwealth Visits Several Philadelphia Polling Places," PR Newswire (Apr. 24, 2012), available at http://www.prnewswire.com/newsreleases/secretary-of-commonwealth-visits-several-philadelphia-polling-places reports-voter-id-soft-rollout-going-well-148733075.html
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1280	C. Aichele, "Protect votes of all citizens" (Jun 4. 2012), available at http://www.philly.com/philly/opinion/20120604_Protect_votes_of_all_citizens.html
1281	Barbara Miller, "Palmyra library hosting session on new voter ID law," The Patriot-News (June 5, 2012), available at http://www.pennlive.com/midstate/index.ssf/2012/06/palmyra_library_hosting_session.html
1282	Pennsylvania Department of State, "Secretary of Commonwealth Announces Voter ID Education Partnership With PA Library Association" (June 6, 2012), available at http://news.yahoo.com/secretary-commonwealth-announces-voter-ideducation-partnership-pa-174119227.html
1283	Pennsylvania Department of State, "Department of State and PennDOT Confirm Most Registered Voters Have Photo ID" (Jul. 3, 2012), available at http://www.prnewswire.com/news-releases/department-of-state-and-penndotconfirm-most-registered-voters-have-photo-id-161244395.html
1284	Bob Warner, "Voter ID law may affect more Pennsylvanians than previously

	estimated" (Jul. 5, 2012), available at http://articles.philly.com/2012-07-05/news/32537732_1_voter-id-new-voter-id-cards
1285	James McGinnis, "More than 70K in Bucks, Montco lack a PennDOT ID to vote" (Jul. 6, 2012), available at http://www.phillyburbs.com/news/local/courier_times_news/more-than-k-in-bucks-montco-lack-a-penndot-id/article_b58005eb-39a6-5646-9705-758a27b909c3.html
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1287	10/26/11 Email between P. Gnazzo, K. Templeton, J. Dolan and K. Myers re: "Questions re: Photo ID bill" (PA-00053730-53731)
1288	1/4/12 Email chain between P. Gnazzo, J. Dolan, Anita Wasko and K. Myers re: "Fiscal Note for HB 934 PN 2873" (PA-00054273-54274)
1289	3/2/12 Email between C. Policastro and A. Swindell re: "Voter ID" (PA-00054245)
1290	4/5/12 Email between A. Sandusky and A. Taylor re: "Voter ID" (PA-00024946-49)
1291	Pennsylvania Department of State Project Scope Statement Draft (PA-00064691- 64696)
1292	Pennsylvania Department of State draft memoranda dated 6/21/12 from I. Harlow to S. Royer re: "PennDOT/ DOS Data Analysis" with handwritten notes (PA-00056738-56740)
1293	Pennsylvania Department of State draft memoranda dated 6/21/12 from I. Harlow to S. Royer re: "PennDOT/ DOS Data Analysis" with handwritten notes (PA-00064711-64712)
1294	Numbers of active and inactive voters in Pennsylvania by county (PA-00071558- 71559)
1295	Pennsylvania Department of State flowchart outlining process to issue a DOS ID
1296	Pennsylvania Department of State project plan and timeline for new DOS Voter ID design, testing and implementation
1297	Draft Pennsylvania Department of State process and procedure document for new DOS Voter ID issuance
1298	7/13/2012 Email from K. Templeton to S. Shenk re: "DOS Voter ID Assessment - Phase 1 Initial Issuance" and attaching Pennsylvania Department of Transportation Analysis of initial DOS Voter ID
1299	MorphoTrust/Safran 7/2/12 response to the Pennsylvania Department of Transportation's RFQ and quote
1300	7/12/2012 design concepts for new Pennsylvania Department of State/PennDOT Voter ID
1301	7/12/12 Email from K. Bartins re: "I.D. / Free I.D."
1302	6/6/12 Email to K. Bartins from S. Shenk re: "Reminder - Voter ID Cards"
1303	5/5/12 Email from K. Bartins to various recipients re: "Manual Certification/Verification of Birth Records"

1304	5/4/12 Email from S. Shenk to various recipients re: "Certification of Birth Records"
1305	"Alternative Process for Pennsylvania Natives Without a Birth Certificate Who Need an ID for Voting"
1306	7/16/12 Email to J. Dolan from K. Templeton re: "Voter ID [redacted]"
1307	5/30/12 Email to J. Dolan and K. Myers from C. Cashman re: "2006 Department of Transportation Study"
1308	5/24/12 Email to S. Shenk, J. Dolan, and K. Myers from C. Cashman re: "PHOTO IDENTIFICATION FOR THE HOMELESS"
1309	"Proposed SSN Exception Processing"
1310	"Timeline Key Identification Verification and Credentialing Enhancements for Driver's License and Identification Cards"
1311	Documents related to Maggie Davenport (VOTE-00002044, VOTE-00002045)
1312	Documents related to Christine Sutter (VOTE-00002046-47)
1313	Pennsylvania Department of State letter to voters regarding Voter ID requirements
1314	Driver's License/Photo ID/Learner's Permit Info for New Residents, Pennsylvania Department of Transportation, http://www.dmv.state.pa.us/new_residents/driver_license.shtml *and* Obtaining Your Driver's License, Pennsylvania Department of Transportation, http://www.dmv.state.pa.us/teenDriversCenter/obtainingLearnersPermit.shtml (current applications for PennDOT driver's license)
1315	8/13/12 FAQ – Pennsylvania Department of State Identification Card
1316	New Pennsylvania Department of State Voter ID
1317	FAQs - Obtaining a free PennDOT Secure Photo ID Card for Voting Purposes
1318	Affirmation That Voter Does Not Possess Proof of Identification for Voting Purposes
1319	Request for Initial Issuance of Pennsylvania Department of State ID for Voting Purposes
1320	PennDOT Internal FAQ for Pennsylvania Department of State ID
1321	Customer Visits a DLC Requesting an ID for Voting Purposes flowchart
1322	Process for Pennsylvania DOS (Department of State) ID (Aug. 17, 2012)
1323	8/28/12 Email from K. Myers to P. Gnazzo et al. re: A more important issue
1324	8/28/12 Email from R. Ruman to S. Royer and M. Sweeney re: DOS ID Questions
1325	9/5/12 Email from J. Dolan to E. Kaplan et al. re: Proof of Residency Verification Form
1326	9/19/12 Email from S. Shenk to W. Taylor et al. re: Alternative Process for Birth Records (attachment DOT_DOH Process 9.19.12.docx)
1327	Screenshot of VotesPA Voter ID Resource Center, available at http://www.votespa.com/portal/server.pt?open=514&objID=1174192&parentname=ObjMgr&parentid=1&mode=2
1328	Press Release, Pennsylvania Department of State, "Secretary of Commonwealth Announces New Voter ID Card" (July 20, 2012)
1329	Press Release, Pennsylvania Department of State, "PennDOT Issuing Free

	Department of State Voter ID Cards at Drivers Licensing Centers" (Aug. 27, 2012)
1330	Pennsylvania Department of State ID for Voting Purposes, Proof of Residence Verification
1331	8/28/12 Email from R. Oyler to J. Marks et al. re: New Pennsylvania Department of State ID Verification Grid (with attachment)
1332	9/7/12 Email from I. Harlow to S. Clemmer re: PA-Born Voters and the new Pennsylvania Department of State ID
1333	9/19/12 Email from E. Alsvan to J. McNight et al. County numbers (with attachment)
1334	8/30/12 Email from M. Sweeney to S. Shenk et al. re: DOS Voter Database
1335	9/18/12 Email from E. Kaplan to S. Royer et al. re: One trip to PennDOT
1336	9/17/12 Email from J. Pena to N. Winkler and J. Marks re: Incorrect and misleading info *still* on DoS website!!!
1337	Jessica Parks, "Study Questions students' access to valid voter ID," philly.com (Sept. 20, 2012)
1338	9/16/12 Email from S. Shenk to R. Beatty et al. re: System Updates
1339	9/12/12 Email from S. Royer to R. Ruman and M. Sweeney re: Helping Latinos Exercise Right to Vote in PA
1340	9/11/12 Email from S. Connolly to R. Ruman re: DRAFT Asian American Op-ED (with attachment)
1341	9/11/12 Email from S. Royer to M. Sweeney to J. Marks re: Voter Registration: Event Request
1342	8/30/12 Email from S. Shenk to M. Sweeney et al. re: Voter ID (with attachment)
1343	7/30/12 Email from J. Marks to K. Kotula and M. Sweeney re: Homeless Voter ID question
1344	9/17 12 Email from I. Harlow to S. Royer re: BCEL FAQs/Scripts (with attachments)
1345	8/10/12 Email from M. Sweeney to S. Shenk et al. re: Berwick PennDOT location
1346	8/22/12 Email from B. Dupler re: M. Sweeney and S. Royer re: Call Memorandum, Duane R. Olson
1347	8/28/12 Email from S. Royer to J. Marks and I. Harlow re: transportation
1348	9/10/12 Letter from M. Schneider to K. Myers re: Registration of Voters at PennDOT Driver's License Centers
1349	9/4/12 Email from J. Marks to D. Burgess et al. re: Help Desk number listed on Notice of Exception
1350	VotesPA.com, Resource Center
1351	8/16/12 Email from K. Kotula to J. Marks et al. re: Voter ID
1352	Pennsylvania Department of State ID - Notice of Exceptions
1353	Press Release, Pennsylvania Department of Transportation, PennDOT Adds Thursday Evening Hours at Five Philadelphia Locations (Sept. 10, 2012)
1354	Voter ID matrix
1355	7/27/12 Email from M. Sweeney to P. Dillon re: Cost of the Voter ID law

1356	8/27/12 Email from S. Shenk to E. Alsvan re; DOS ID (with attachment)
1357	7/9/12 Email from J. Dolan to K. Myers et al. re: DDL DOS Change (with attachment)
1358	9/7/12 Email from K. Mattis to J. Snader et al. re: Voter ID expenses (with attachment)
1359	8/30/12 Email from D. Burgess to J. Marks et al. re: DOS Voter Database
1360	9/17/12 Email from C. Wolpert to J. Marks et al. re: Exception Calls from 7:30-8:00 and 5:00-6:00
1361	Pennsylvania Department of State ID for Voting Purposes Exceptions Processing
1362	7/25/12 Email from S. Shenk to J. Marks re: DOS ID
1363	8/27/12 Email from K. Kotula to J. Marks et al. re: DOS ID Card Verification Types
1364	8/31/12 Email from I. Harlow to J. Marks re: Phone Stats
1365	9/14/12 Email from S. Shenk to J. Marks re: DOS ID
1366	9/16/12 Email from J. Mathis to J. Marks re: DOS ID
1367	8/28/12 Email from C. Wolpert to T. Goril et al. re: URGENT EMAIL: Department of State ID for Voting Purposes
1368	9/19/12 Email from B. Smotherman to S. Royer et al. re: Voter ID Call Center Plan
1369	Requirements for HAVA Verification for Pennsylvania Department of State ID
1370	8/24/12 Email from J. Marks to S. Shenk et al. re: Pdp Evertte Butcher- dl
1371	9/18/12 Email from K. Tyson to R. Ruman et al. re: Please Confirm Message in Article
1372	9/17/12 Email from M. Sweeney to K. Myers et al. re: Rep. Youngblood
1373	8/23/12 Email from M. Sweeney to S. Shenk re: Voter Application
1374	8/30/12 Email from M. Sweeney to A. Gattuso and M. Montero re: Voter ID units in State Rep offices
1375	9/12/12 Email from B. Smotherman to C. Aichele et al re: Request for Updates: DOS Weekly Report to Governor's Office (with attachment)
1376	8/23/12 Email from S. Shenk to M. Sweeney re: Voter Application
1377	8/30/12 Email from M. Sweeney to M. Weglos re: Weekly Voter ID Reports
1378	8/28/12 Harmelin SIPO
1379	8/30/12 Email from S. Royer to B. Dupler re: September Senior Voter ID Event (with attachment)
1380	8/1/12 Email from I. Harlow to K. Kotula et al re: Posters (with attachment)
1381	9/19/12 Email from J. McKnight to R. Ruman et al. re: Power 99 Talking Points for your approval
1382	8-27-12 internal budget
1383	9/20/12 Memorandum from G. Blint to S. Royer re: Voter ID Education Campaign
1384	6/22/12 Memorandum from T. Fauver to PA Public Transportation Providers re: Pa Voter I.D. Law
1385	8/23/12 Email from D. Heisler to M. Sweeney et al. re: Berwick PennDOT and voter ID followup

1386	8/27/12 Email from S. Shenk to PD-DL Center Supervisors et al. re: DOS ID (with attachment)
1387	8/29/12 Email from M. Sweeney to E. Alsvan re: PennDOT complaint
1388	8/6/12 Email from E. Kaplan to M. Sweeney et al. re: Problems with PennDOT (with attachment)
1389	9/7/12 Letter from B. Josephs to C. Aichele re: I noticed that the Department of State
1390	Memo from M. Sweeney to S. Royer re: Voter ID Report: August 31 - September 14, 2012
1391	8/30/12 Email from J. Marks to S. Poppy et al. re: Department of State (with attachment)
1392	8/29/12 Email from E. Alsvan to M. Sweeney re: New State ID Penalizes PA-Born Voters
1393	8/10/12 Email from S. Clemmer to I. Harlow et al. re: PA website - Chinese form
1394	8/15/12 Email from M. Sweeney to K. O'Donnell re: Question for Dept of State
1395	8/30/12 Email from K. Myers to C. Aichele re: Issuance Numbers
1396	9/11/12 Email from S. Royer to M. Sweeney and J. Marks re: Voter Registration: Event Request
1397	9/19/12 Email from P. Gnazzo to K. Myers et al. re: voter id woes
1398	8/30/12 Email from E. Kaplan to J. Dolan et al. re: DOS ID Questions
1399	8/28/12 Email from P. Geho to M. Sweeney et al. re: A more important issue
1400	8/30/12 Email from M. Sweeney to S. Shenk et al. re: DOS Voter Database
1401	9/5/12 Email from M. McCord to M. Sweeney re: free voter ID
1402	9/10/12 Email from E. Chapman to M. Sweeney re: Photo ID constituent issue
1403	8/24/12 Email from D. Martin to M. Sweeney re: Please HELP with a constituent!
1404	8/30/12 Email from S. Shenk to M. Sweeney re: Voter ID
1405	8/31/12 Letter from J. Dolan to M. Sudler re: You recently visited a PennDOT Drivers License Center
1406	Martha Sudler birth certificate
1407	Jury Duty notice to Benny Scott
1408	CCS Medical letter to Benny Scott
1409	Application for Initial Identification Card for Benny Scott
1410	9/5/12 Letter from BCEL to Benny Scott
1411	SSA verification for Benny Scott
1412	Press Release, Pennsylvania Department of State, "Secretary of Commonwealth Announces Simplified Method to Obtain Photo ID for Pennsylvania-Born Voters" (May 23, 2012)
1413	Jeremy Roebuck and Angela Couloumbis, "Montco to issue voter ID cards," philly.com (Sept. 21, 2012)
1414	http://www.pacast.com/players/cmsplayer.asp?video_filename=10027_State_Vot erID_English.m4v (last visited September 23, 2012)
1415	Spreadsheet, Pennsylvania Department of State - Card Type 15 - (8/30/2012)
1416	9/20/12 Email from J. Mathis to S. Singer re: Postcard

1417	Video Deposition of Viviette Applewhite, dated June 26, 2012
1418	Video Deposition of Joyce Block, dated June 25, 2012
1419	Deposition of Beatrice Bookler, dated June 25, 2012
1420	Deposition of Gloria Cuttino, dated July 13, 2012
1421	Deposition of Wilola Shinholster Lee, dated June 26, 2012
1422	Identification documents and video for Marion Baker
1423	Identification documents for William Brown
1424	Identification documents for Adam Bruckner
1425	Identification documents for Herbert Ginensky
1426	Identification documents for Teresa Giuliana
1427	Identification documents and video for Catherine Howell
1428	Identification documents and video for Theresa Kukowski
1429	Identification documents for Marcos Malave
1430	Identification documents for Patricia Norton
1431	Identification documents for Margaret G. Pennington
1432	Identification documents and video for Mina Pripstein
1433	Identification documents for David Proctor
1434	Identification documents for Carole Reigle
1435	Identification documents for Andrew Rogoff
1436	Identification documents and video for Shirley Sykes
1437	Identification documents for Mary Toadvin
1438	6/6/13 Stipulation on Representative Daryl D. Metcalfe statements
1439	Excerpt of the *Legislative Journal* for 3/13/2012 related to proceedings of the Pennsylvania House of Representatives
1440	3/20/12 letter from D. Metcalfe to U.S. Rep. Robert Brady
1441	3/27/12 statement issued by D. Metcalfe, "Metcalfe Tells Congressman Brady to Stop Endorsing Voter Fraud and Corruption"
1442	7/18/12 statement issued by D. Metcalfe, "Voter Photo ID Sponsor Metcalfe Confirms Philadelphia Corruption Findings Will Trigger Future Action Against Election Fraud"
1443	CD containing 8/15/12 audio recording and written transcript of audio recording
1444	CD containing 9/20/12 audio recording
1445	Brad Bumsted, "Pennsylvania voter ID mastermind says law too relaxed," *Pittsburgh Tribune-Review* (Sept. 27, 2012)
1446	3/6/13 Email from D. Metcalfe to S. Barrar et al.
1447	3/6/13 Email from S. Barrar to D. Metcalfe et al.
1448	10/26/12 Letter from D. Metcalfe to C. Aichele
1449	11/1/12 Letter from C. Aichele to D. Metcalfe
1450	6/12/13 regarding authenticity of public statements of C. Aichele, T. Corbett, and M. Turzai
1451	Carol Aichele, "Need More Protections Against Voter Fraud," *The Philadelphia Inquirer* (Oct. 10, 2011)
1452	Press Release, Office of the Governor, "Governor Corbett Signs Voter ID Bill to Require Photo Identification" (March 14, 2012)

1453	Press Release, Pennsylvania Department of State, "Secretary of Commonwealth Visits Several Philadelphia Polling Places, Reports Voter ID 'Soft Rollout' Going Well " (April 24, 2012)
1454	Bob Warner, "Report Turns Up Philadelphia Voting Irregularities," Philly.com (July 20, 2012)
1455	Press Release, Office of the Governor, "Governor Corbett, Secretary of Commonwealth Respond to Voter ID Ruling" (Aug. 15, 2012)
1456	"Pennsylvania Secretary of Commonwealth: Photo ID Protects Integrity of Every Vote," PR Newswire (Aug. 23, 2011)
1457	Press Release, Office of the Governor, "Governor Corbett, Secretary Aichele Issue Statements on Court Ruling" (Oct. 2, 2012)
1458	10/2/12 statement by M. Turzai, "Voter Identification Law Withstands Lawsuit, Decision Ultimately Ensures Integrity in Pennsylvania Elections"
1459	6/14/13 Stipulation on Pennsylvania Department of Transportation budget request for 2013-2014
1460	2013 Spreadsheet of Pennsylvania Department of Transportation Wait Times
1461	Gene Demby, "Pennsylvania Voter ID Law: Mike Turzai Repeats Debunked Myth About Election Fraud," The Huffington Post (Aug. 16, 2012)
1462	9/14/12 Interview with Governor Corbett, available at http://www.youtube.com/watch?v=JEVPMI9oB20
1463	3/13/12 Statement by Governor Corbett, available at http://www.youtube.com/watch?NR=1&v=_BWSyQfNMWs&feature=endscreen
1464	3/14/12 Statement by Governor Corbett, available at http://www.youtube.com/watch?v=Rvwtkm_aHYk; Press release, Office of the Governor
1465	Tara Jerry, "Corbett Signs Voter ID Bill," available at http://www.politicspa.com/corbett-signs-voter-id-bill/32748/
1466	RFQ 1 - Red House Communications
1467	RFQ 4 - Red House Communications
1468	Deposition of Gloria Blint, dated June 13, 2013
1469	7/2/12 Red House proposal (PA-00101827-101895)
1470	7/20/12 Letter to G. Blint (PA-00101817)
1471	M2M Project for PATF (PA-00101857-59)
1472	RFQ 1 - Questions (PA-00009500-09)
1473	RFQ 4 - Questions (PA-00100934-37)
1474	8/5/12 Email (PA-00100549)
1475	Revised Red House PO (PA-00100588_
1476	Deposition of Lyn Strickler, dated June 14, 2013
1477	Strickler Exhibit 1: 5/14/13 Letter to Harmelin Media from B. Geffen with attachments
1478	Strickler Exhibit 2: 5/4/12 Email from I. Neveil to K. Cummings et al. with attachments
1479	Strickler Exhibit 3: 8/27/12 Email from M. Rutz to S. Royer, et al. with attachments
1480	Strickler Exhibit 4: 8/24/12 Email from M. Rutz to S. Royer, et al., with

	attachments
1481	Strickler Exhibit 5: 9/19/12 Email from M. Rutz to S. Royer, et al.
1482	Strickler Exhibit 6: 9/19/12 Email from M. Rutz to S. Royer, et al.
1483	Strickler Exhibit 7: 8/8/12 Email from M. Sweeney to R. Royer and R. Ruman
1484	Strickler Exhibit 8: College Newspaper Ad Buys
1485	Strickler Exhibit 9: 9/20/12 Memorandum from M. Rutz to S. Royer
1486	Strickler Exhibit 10: 8/24/12 Email from M. Rutz to R. Ruman et al. (forwarded 6/13/13 from M. Rutz to M. Rutz)
1487	Strickler Exhibit 11: Harmelin PowerPoint: "2012 general election Media recap"
1488	Meeting Invitation for 6/27/12 on Voter ID with attachments
1489	Process for Voter ID for Customers Who Do Not have a Birth Certificate
1490	Applewhite et al. v. Commonwealth of Pennsylvania, Notice of Deposition for Pennsylvania Department of Transportation designee(s) (July 18, 2012)
1491	Draft copy of 7/12/12 Process for Department of State IDs
1492	Pennsylvania Department of State ID Project Plan Dated July 13, 2013
1493	5/20/11 Email from K. Myers to B. Kendro on HB 934
1494	4/14/11 Email from J. Dolan to K. Myers et al. on HB 647 and HB 934
1495	7/10/12 Email from W. Cressler to K. Myers on HB 1318 Election Code Bill
1496	7/9/12 Email from K. Myers to D. Smith
1497	3/2/12 Email from P. Gnazzo to D. Guyer et al. on "Voter ID"
1498	Applewhite et al. v. Commonwealth of Pennsylvania, Notice of Deposition for K. Myers, B. Kendro, M. Matthew, R. Ruman, I. Harlow, J. Marks, and D. Burgess (June 26, 2012)
1499	7/15/12 Voter ID Report from M. Sweeney to S. Royer (PA-00061799-1803)
1500	6/7/12 Email dated from J. Marks to R. Oyler on 'Voter ID'
1501	6/12/12 Email from S. Royer to K. Kotula et al. on Department of State ID for Voting Purposes - Discussion Items
1502	6/27/12 Document on Department of State and PennDOT Conference Call on the Department of State ID Cards
1503	7/16/12 Request for Initial Issuance of Pennsylvania Department of State ID for Voting Purposes
1504	PennDOT Concept design for the Pennsylvania Department of State ID Card, dated July 12, 2012
1505	Deposition of Jonathan Marks, dated June 6, 2013
1506	2013 Marks Exhibit 1: Transcript of July 30, 2012 Hearing
1507	2013 Marks Exhibit 2: Spreadsheet of DOS ID Card
1508	2013 Marks Exhibit 3: 7/23/12 Email from S. Royer to P. Dillon et al. re: "DOS identification card statutory authority" (PA-00128136)
1509	2013 Marks Exhibit 4: 3/6/13 Email from S. Barrar to D. Metcalfe re: "Important Information re: DOS ID for Voting Purposes"
1510	2013 Marks Exhibit 5: 11/29/11 Memorandum "H.B. 934 (Voter Photo ID) Issues Affecting Senior Citizens and Disabled Voters" (PA-00006501-06)
1511	Deposition of Kurt Myers, dated June 4, 2013
1512	2013 Myers Exhibit 1: Amended Notice of Deposition

1513	2013 Myers Exhibit 2: Amended Notice of Deposition
1514	2013 Myers Exhibit 3: Stipulation Regarding PennDOT Web Searches
1515	2013 Myers Exhibit 4: 2/14/13 Affirmation That Voter Does Not Possess Proof of Identification For Voting Purposes
1516	2013 Myers Exhibit 5: Transcript of 9/25/12 Hearing
1517	2013 Myers Exhibit 6: Request for Initial Issuance of Free Pennsylvania Department of State ID for Voting Purposes
1518	2013 Myers Exhibit 7: 8/17/12 Letter from J. Schultz to T. Perez
1519	2013 Myers Exhibit 8: Communication from PennDOT to H. Ginensky (VOTE-00002111-14)
1520	Deposition of S. Royer, dated June 5, 2013
1521	2013 Royer Exhibit 1: 6/7/11 Email from R. Oyler to P. Geho re: "Voter ID" (PA-00005098-5101)
1522	2013 Royer Exhibit 2: Postcard regarding Photo ID Law
1523	2013 Royer Exhibit 3: Respondents' Answers to Petitioners' Fourth Set of Interrogatories
1524	2013 Royer Exhibit 4: 11/29/11 Email from R. Oyler to R. Oyler re: "REVISED H.B. 934 (Voter ID) Memo" (PA-00006594-95)
1525	2013 Royer Exhibit 5: 11/29/11 Memorandum re: "H.B.934 (Voter Photo ID) Issues Affecting Senior Citizens and Disabled Voters" (PA-00006501-06)
1526	2013 Royer Exhibit 6: 10/4/12 CBSlocal article "Secretary of the Commonwealth Discusses Fate of Voter ID Law During Visit To Philadelphia"
1527	2013 Royer Exhibit 7: 4/19/13 Letter from T. Keating to D. Hurley
1528	2013 Royer Exhibit 8: Committee of Seventy Poll: Voter ID: Philadelphia County Election Day Survey
1529	2013 Royer Exhibit 9: Video of Secretary of State Aichele Testimony Regarding Budget for the Department of State
1530	2013 Royer Exhibit 10: Spreadsheet of Number of PennDOT and DOS ID issued as of May 11, 2013
1531	2013 Royer Exhibit 11: H.B. 934
1532	2013 Royer Exhibit 12: 7/23/12 Email from S. Royer to P. Dillon re:"DOS identification card statutory authority" (PA-00128136)
1533	2013 Royer Exhibit 13: Respondents Supplemental Response to Interrogatory Number 24 of Petitioners' Third Set of Interrogatories
1534	2013 Royer Exhibit 14: 8/13/12 PhillyTrib.com article "Secretary of State Defends Voter ID"
1535	Deposition of Megan Sweeney, dated June 7, 2013
1536	2013 Sweeney Exhibit 1: 3/21/12 Email from M. Sweeney to L. Hock re: "Voter ID Email from Governor's Office" (PA-00025154-55)
1537	2013 Sweeney Exhibit 2: 4/4/12 Email from M. Sweeney to M. Sweeney re: "Voter ID" (PA-00032258)
1538	2013 Sweeney Exhibit 3: 10/17/12 Email from J. Marks to J. Marks et al: " Two Important Reminders" with attachments (PA-00118828-837)
1539	2013 Sweeney Exhibit 4: "Disciplined, Responsible and Efficient: Highlights from the Proposed FY 2013-2014 Budget" (PA-00123974-990)
1540	2013 Sweeney Exhibit 5: 6/1/12 Email from P. Geho to K. Kissinger et al.

	Re: "Voter ID at Riddle Village" (PA-00090081-83)
1541	2013 Sweeney Exhibit 6: 10/2/12 Email from G. Blint to S. Royer et al. Re: "Revised materials" with attachments (PA-00125323-29)
1542	2013 Sweeney Exhibit 7: 4/9/12 Email from M. Sweeney to M. Sweeney re: "Potter County AAA Question" (PA-00128063-65)
1543	2013 Sweeney Exhibit 8: 9/11/12 Email from S. Shenk to M. Sweeney re: "Voter Registration Event Request" (PA-00106284-85)
1544	2013 Sweeney Exhibit 9: 5/9/12 Email from M. Sweeney to P. Geho re: "Shared Ride" (PA-00032200)
1545	2013 Sweeney Exhibit 10: 8/27/12 Email from M. Rutz to S. Royer et al. Re: "Department of State Voter ID: TV & Cable Schedules" with attachments (PA-00111287-1335)
1546	2013 Sweeney Exhibit 11: 9/19/12 Email from M. Rutz to S. Royer et al. Re: "Dept. of State Voter ID: African American and Hispanic Radio Schedule" with attachments (PA-00097945-962)
1547	2013 Sweeney Exhibit 12: 9/19/12 Email from M. Rutz to S. Royer et al. Re: "Voter ID: KYW & KDKA radio Schedules" with attachment (PA-00100139-140)
1548	2013 Sweeney Exhibit 13: 8/18/12 Email from M. Sweeney to S. Royer at al. re: "Voter ID Outreach Flowchart" with attachment (PA-00099210-213)
1549	2013 Sweeney Exhibit 14: Harmelin Media chart of College Newspapers (PA-00097842-43)
1550	2013 Sweeney Exhibit 15: 8/24/12 Email from M. Rutz to S. Royer et al. re: "Final Voter ID, General Election 2012 Flowchart & Revised Summary of Purchase order (SIPO)" with attachment (PA-00098089-8092)
1551	2013 Sweeney Exhibit 16: 6/20/12 Email from M. Sweeney to B. Dupler re: "Thanks! :)" with attachment (PA-00061773-75)
1552	2013 Sweeney Exhibit 17: 11/5/12 Email from S. Royer to R. Ruman et al. re: "Dept of State: Voter ID Recap Deck" with attachment (PA-00123898-3932)
1553	2013 Sweeney Exhibit 18: 10/2/12 Email from M. Sweeney to N. Winkler et al. re: "Voter ID Paid Media Campaign Information" with attachments (PA-00125515-19)
1554	2013 Sweeney Exhibit 19: Postcard
1555	2013 Sweeney Exhibit 20: 8/3/12 Email from M. Sweeney to C. Bailey et al. Re: "Revised PowerPoint" with attachment (PA-00098470-87)
1556	2013 Sweeney Exhibit 21: 8/23/12 Email from M. Sweeney to M. Rutz et al. Re: "Harmelin Media - Welcome to Broadnet!" (PA-00105306-08)
1557	Deposition of Rebecca Oyler, dated June 10, 2013
1558	2013 Oyler Exhibit 1: 12/2/11 Email from R. Oyler to S. Royer et al. Re: "Voter ID Bill Agreement" (PA-00006586-87)
1559	2013 Oyler Exhibit 2: 9/26/11 Email from G Reinard to R. Oyler et al. Re: Voter ID" (PA-00006591-93)
1560	2013 Oyler Exhibit 3: 5/13/11 Email from J. Murzyn to P. Geho re: "Voter ID bill update" (PA-00005094-95)
1561	2013 Oyler Exhibit 4: 11/29/11 Email from R. Oyler to R. Oyler et al. Re:

	"REVISED H.B. 934 (Voter ID) Memo" (PA-00006594-95)
1562	2013 Oyler Exhibit 5: 11/29/11 Memorandum re: "H.B. 934 (Voter Photo ID) Issues Affecting Senior Citizens and Disabled Voters" (PA-00006501-06)
1563	Deposition of Patrick Geho, dated June 10, 2013
1564	2013 Geho Exhibit 1: 11/17/11 Email from. P. Geho to S. Royer re: "Voter ID (CONFIDENTIAL)" (PA-00006707)
1565	2013 Geho Exhibit 2: 10/24/11 Email from P. Geho to S. Royer re: "HB 934" (PA-00005915)
1566	2013 Geho Exhibit 3: 12/2/11 Email from R. Oyler to S. Royer et al. re: "Voter ID Bill Agreement" (PA-00006586-87)
1567	2013 Geho Exhibit 4: 11/29/11 Email from R. Oyler to R. Oyler et al. re: "REVISED H.B. 934 (Voter ID) Memo" (PA-00006594-95)
1568	2013 Geho Exhibit 5: 11/29/11 Memorandum re: "H.B. 934 (Voter Photo ID) Issues Affecting Senior Citizens and Disabled Voters" (PA-00006501-06)
1569	2013 Geho Exhibit 6: 2/1/12 Email from P. Geho to S. Royer "Voter ID" (PA-00005045)
1570	2013 Geho Exhibit 7: 7/23/12 Email dated from P. Dillon to S. Clemmer et al. Re: DOS identification card statutory authority" (PA-00128114)
1571	2013 Geho Exhibit 8: 8/5/12 Email from R. Oyler to B. Burgess re: "Voter ID" (PA-00015011-12)
1572	2013 Geho Exhibit 9: 5/13/11 Email from J. Murzyn to P. Geho re: "Voter ID bill update" (PA-00005094-95)
1573	2013 Geho Exhibit 10: 8/13/12 Email from P. Geho to M. Sweeney re: "VOTER ID CONCERN AND MR. TURZAI's COMMENT" (PA-00085310-11)
1574	Deposition of Jennifer Riley, dated June 11, 2013
1575	2013 Riley Exhibit 1: 5/14/13 Letter from B. Geffen to Bravo Group with subpoena
1576	2013 Riley Exhibit 2: 6/4/12 Expedited RFQ Template for Projects Under $250,000 (PA-00100366-386)
1577	2013 Riley Exhibit 3: Creative Advertising and Audio Visual Bravo Group Technical Submission (PA-00100387-424)
1578	2013 Riley Exhibit 4: Attachment B Cost Matrix from Bravo Group, Inc. (PA-00062975)
1579	2013 Riley Exhibit 5: 6/25/12 Letter from Pennsylvania Department of State to Rhett Hintze (PA-00100425-427)
1580	2013 Riley Exhibit 6: 8/3/12 Email from M. Sweeney to C. Bailey re: "Revised PowerPoint" with attachment (PA-00098470-487)
1581	2013 Riley Exhibit 7: 9/28/12 Email from J. Riley to M. Sweeney re: "Bravo Group: Weekly Report - Week of Sept 23" (with attachments) (PA-00123852; PA-00123853; PA-00123854; PA-00123855)
1582	2013 Riley Exhibit 8: 8/23/12 Email from S. Connolly to R. Ruman re: "Memo on Bravo-Skyler outreach efforts" (with attachments) (PA-00099313-15)
1583	2013 Riley Exhibit 9: Voter ID Handout (PA-00106974-75)
1584	2013 Riley Exhibit 10: 9/18/12 Email from S. Royer to C. Wolf re:

	"Contract" with attachment (PA-00098201-02)
1585	2013 Riley Exhibit 11: 10/9/12 Email from M. Sweeney to J. Riley re: "Revised.pdf of the Voter ID handout" with attachment (PA-00124229-32)
1586	Deposition of Kelly O'Donnell, dated June 13, 2013
1587	O'Donnell Exhibit 1: 11/29/11 Email from R. Oyler to R. Oyler et al. re: "REVISED H.B. 934 (Voter ID) Memo" (PA-00006594-95)
1588	O'Donnell Exhibit 2: 11/29/11 Memorandum re: "H.B. 934 (Voter Photo ID) Issues Affecting Senior Citizens and Disabled Voters" (PA-00006596-6601)
1589	O'Donnell Exhibit 3: 3/16/12 Email from K. O'Donnell to R. Oyler and P. Geho re: "Voter ID" (PA-00051205-07)
1590	O'Donnell Exhibit 4: 9/18/12 Email from K. O'Donnell to K. O'Donnell et al re: "Follow-Up to 9/28 Voter ID Conference Call" (PA-00120368-69)
1591	O'Donnell Exhibit 5: 8/31/12 Email from M. Sweeney to E. Alsvan re: "photo ids from senior center" (PA-00085167-69)
1592	O'Donnell Exhibit 6: 4/9/12 Email from M. Sweeney to M. Sweeney re: "Potter County AAA Question" (PA-00128063-65)
1593	Deposition of Ronald Ruman, dated June 5, 2013
1594	6/12/12 Email from R. Ruman to M. Wagner and S. Royer re: "AL DIA" (PA-00081219-220)
1595	5/7/12 Email from R. Ruman to K. Cummings et al. Re: "Harmelin SIPO for General Election Media Plan" (PA-00029120-22)
1596	7/27/12 Email from S. Royer to I. Neveil et al. re: "Follow up from 7/26 meeting/conference call" (PA-00099536-37)
1597	8/24/12 Email from S. Royer to S. Royer et al. Re: "Vote Recommendation" with attachments (PA-00098617-24)
1598	3/8/12 Email from R. Ruman to B. Dupler re: "PR plan for voter ID" with attachment (PA-0007123-25)
1599	9/12/12 Email from S. Royer to M. Rutz re: "Helping Latinos Exercise Right to Vote in PA" (PA-0009958-60)
1600	3/23/12 Email from K. Cummings to S. Royer et al. re: "Cost Estimates" with attachment (PA-00048999-49000)
1601	10/9/12 Email from R. Ruman to M. Wagner et al. re: "Revised TV, radio, print spots" (PA-00124244-45)
1602	11/6/12 Email from J. Marks to I. Harlow et al. re: "Urgent - Corbett mailer hit today saying Photo ID is required" (PA-00113018-19)
1603	Deposition of Laverne Collins, dated June 13, 2013
1604	Collins Exhibit 1: Amended Deposition Notice
1605	Collins Exhibit 2: 6/22/12 Email from T. Fauver to N. Basile et al. re: "PA Voter I.D Law - Public Transportation" (PA-00113290-92)
1606	Collins Exhibit 3: 6/21/12 Email from L. Collins to M. Sweeney et al. re: "Voter ID - Public Transportation" (with attachment) (PA-00080310)
1607	Collins Exhibit 4: Draft message to PA Public Transportation Providers re: "PA Voter I.D. Law" (PA-00080311)
1608	Collins Exhibit 5: 6/25/12 Email from E. Adams to T. Scott et al. re: "PA Voter I.D. Law - Public Transportation"
1609	Collins Exhibit 6: 6/25/12 Email from L. Collins to J. Dockendorf et al. re:

	"FW: PA Voter I.D Law - Public Transportation" (PA-00113286-89)
1610	Collins Exhibit 7: 7/26/12 Email from M. Imbrogno to T. Fauver re: "PA Voter I.D. Law - Public Transportation"
1611	Collins Exhibit 8: 9/12/12 Email from C. Corioso to L. Collins re: "Potter County AAA Question"
1612	Collins Exhibit 9: Email dated April 2013 from M. Sweeney to M. Sweeney re: "FW: Susquehanna County" (PA-00128068)
1613	Collins Exhibit 10: "Shared Ride Program for Seniors and Voters with Disabilities" (PA-00037138)
1614	Respondents' Responses to Petitioners' First Set of Interrogatories
1615	Amended Answers of Respondents to Petitioners' First Set of Interrogatories
1616	Respondents' Responses to Petitioners' Third Set of Interrogatories
1617	05/13/13 Letter from T. Keating to M. Rubin re: Respondents' responses to Petitioners' Third Set of Interrogatories with verification
1618	Respondents' Supplemental Response to Interrogatory Number 24 of Petitioners' Third Set of Interrogatories
1619	Respondents' Answers to Petitioners' Fourth Set Interrogatories
1620	Department of State, "Temple Students Commended for Call to Add Expiration Dates to ID Cards" (April 13, 2012)
1621	Department of State, "Secretary of Commonwealth urges participation in primary election; reminds voters they will be asked but not required to show photo id" (May 14, 2013)
1622	Department of State, "VotesPA website enhanced, social media efforts launched on voter ID law" (August 13, 2012)
1623	Pennsylvania Department of Transportation, "PennDOT Issuing Free Department of State Voter ID Cards at Driver Licensing Centers" (August 27, 2012)
1624	Pennsylvania Department of State and Department of Transportation, "Department of State, PennDOT announce DOS voter ID available to all voters with one trip to PennDOT" (September 25, 2012)
1625	Pennsylvania Department of State, "Secretary of Commonwealth Commends Penn State for Making Student IDs Acceptable for Voting" (September 26, 2012)
1626	Pennsylvania Department of State, "Department of State Announces Online Election Complaint Form" (October 24, 2012)
1627	Pennsylvania Department of State, "Department of State Secretary of Commonwealth Reminds Voters of Election Day Rules" (November 5, 2012)
1628	Pennsylvania Department of State, "Voters used new department of state election complaint website" (Nov. 14, 2012)
1629	Pennsylvania Voter ID Law - General FAQ (March 6, 2013)
1630	Video of Testimony of Secretary of State Carol Aichele at February 2013 Senate Appropriations Committee Hearing
1631	Transcript of Testimony of Secretary of State Carol Aichele at February 2013 House of Representatives Appropriations Committee Hearing
1632	Pennsylvania Department of Transportation Appropriations for Photo ID
1633	Committee of Seventy November 2012 Election Day Survey

1634	Committee of Seventy Exit Poll, Election Day, November 6, 2012
1635	Committee of Seventy 2012 Election Day Exit Polls: Instructions for Volunteers
1636	PA Voter ID Law - Substantially Conform (April 29, 2012)
1637	PA Voter ID Law - Military Voters (March 6, 2013)
1638	PA Voter ID Law - Care Facilities/Elderly/Disabled (March 6, 2013)
1639	PA Voter ID Law - Colleges and Universities (March 6, 2013)
1640	PA Voter ID Law - Local Government Employees (March 6, 2013)
1641	PA Voter ID Law - Homeless (March 6, 2013)
1642	List of PA Care Facility Assisted Living Residencies
1643	List of PA Care Facility Long Term Care Facilities
1644	List of PA Care Facility Personal Care Homes
1645	List of PA Institutions of Higher Learning
1646	FAQ - Department of State Identification Card (March 6, 2013)
1647	Pennsylvania Voter Registration Mail Application Form
1648	Application for Absentee Ballot
1649	Application for Emergency Absentee Ballot
1650	Emergency Application for Absentee Ballot (For Emergencies That Occur After 5 p.m. on the Friday Before the Primary or General Election)
1651	Application for a Permanent Absentee Ballot
1652	Application for Alternative Ballot
1653	Application for Emergency Alternative Ballot
1654	SLC documents (VOTE-00002066)
1655	Documents produced by Laila Stones (VOTE-00002094-2106)
1656	Documents produced to Respondents (VOTE-00002071)
1657	11/16/11 Email from P. Geho to R. Oyler re: "Fw: Voter ID" (with attachment) (PA-00006151; PA-00006152-53)
1658	11/17/11 Email from K. O'Donnell to R. Oyler et al. re: "Memo -DOS/Aging" (with attachment) (PA-00006482; PA-00006483-85)
1659	11/21/11 Email from D. Gingerich to R. Oyler et al. re: "RE: Memo - DOS/Aging" (with attachment) (PA-00006564-65; PA-00006566-571)
	05/14/12 Email from K. O'Donnell to M. Sweeney et al. re: "Continuing Care Retirement Communities (CCRC's) Requesting Clarification" (PA-00030923)
1660	4/23/2012 Email from M. Sweeney to K. O'Donnell re: "RE: Facility ID Template" (with attachments) (PA-00034862-63; PA-00034864-67; PA-00034868-69)
1661	09/28/12 Email from K. O'Donnell to M. Sweeney re: "Retirement Homes for Nuns" (PA-00113270-71)
1662	09/28/12 Email from K. O'Donnell to K. O'Donnell et al. re: "Follow-Up to 9/28 Voter ID Conference Call" (PA-00120368-69)
1663	PhillyTrib.com article "Secretary of State Defends Voter ID" (August 23, 2012)
1664	09/5/12 Email from J. Marks to S. Royer re: "RE: Heads up: Letter to Secretary Aichele" (PA-00119452-53)
1665	08/23/12 Email from S. Royer to D. Burgess re: "RE: Thursday clips" (PA-

	00099764-771)
1666	11/17/11 Email from S. Royer to P. Geho et al. re: "Re: Voter ID (CONFIDENTIAL)" (PA-00006582)
1667	08/13/12 Email from G. Blint (Red House Communications) to S. Royer et al. re: "Exterior/Interior Bus Cards 3/4"
1668	08/13/12 Email from G. Blint (Red House Communications) to S. Royer et al. re: "For your review: Outdoor Billboards 1/4"
1669	10/04/12 Newspaper Ad copy with the headline "IF YOU WANT TO VOTE, SHOW IT" with a recommended revised headline of "IF YOU HAVE IT, SHOW IT."
1670	02/19/13 Budget Hot Topics
1671	09/06/12 Email from D. Burgess to S. Royer et al. re: "RE: PennDOT ID backfill could be better" (PA-00112886-87)
1672	11/02/12 Email from M. Milano (Harmelin Media) to M. Sweeney et al. re: "RE: follow-up question on billboards"
1672	11/17/11 Email from S. Royer to P. Geho et al. re: "Re: Voter ID (CONFIDENTIAL)" (PA-00005747)
1673	03/01/12 Email from P. Geho to S. Royer et al. re: "ACTION REQUESTED: When is Photo ID required?" (PA-00005038-39)
1674	06/23/11 Email from P. Geho to D. Metcalfe et al. re: "HB 934 ID Information" (PA-00005408)
1675	11/23/11 Email from P. Geho to S. Royer et al. re: "Fw: Voter ID" (updated voter ID language for HB 934) (PA-00006023)
1676	04/26/12 Email from P. Geho to M. Sweeney re: "FW: Veteran ID Cards (UNCLASSIFIED)" (PA-00032239-241)
1677	12/14/11 Legislative Bill Analysis of HB 934 (PA-00005426-433)
1678	11/22/11 Email from R. Oyler to C. Abruzzo et al. re: "H.B. 934 (Voter ID) Memo" (PA-00006238)
1679	11/22/11 Memorandum from Offices of Policy and Legislative Affairs, Departments of Aging and State to C. Abruzzo et al. re: "H.B. 934 (Voter Photo ID) Issues Affecting Senior Citizens and Disabled Voters" (PA-00005909-914)
1680	11/23/11 Email from R. Oyler to J. Murzyn et al. re: "RE: Voter ID" (aging analysis) (PA-00005814-17)
1681	11/21/11 Draft Memorandum from Offices of Policy and Legislative Affairs, Departments of Aging and State to C. Abruzzo et al. re: "H.B. 934 (Voter Photo ID) Proposal Affecting Senior Citizens" (PA-00005989-994)
1682	02/01/12 Email from J. Murzyn to P. Geho re: Voter ID" (PA-00005750)
1683	05/11/12 Email from T. Fauver to K. Myers re: "Re: Voter ID" (PA-00054149-150)
1684	06/21/12 Email from M. Sweeney to L. Collins et al. re: "RE: Voter ID - Public Transportation" (PA-00080017)
1685	6/3/13 Email from S. Royer to J. Guyer re: "Possible DOS Voter ID Educational Campaign"
1686	Photocopy of Pennsylvania Department of State Employee ID of J. Marks
1687	Pennsylvania Department of State ID Exceptions Sharepoint Export as of

	6/7/13
1688	U.S. Government Form I-9
1689	Information related to U.S. Government Form I-9 form available at: http://www.uscis.gov/portal/site/uscis/menuitem.eb1d4c2a3e5b9ac89243c6a7543f6d1a/?vgnextoid=84c267ee5cb38210VgnVCM100000082ca60aRCRD&vgnextchannel=84c267ee5cb38210VgnVCM100000082ca60aRCRD
1690	05/03/2012 CBS Local news article "Most College IDs Don't Comply With Pennsylvania's New Voter ID Law"
1691	07/20/2012 Philly.com article "Latest voter-ID data add confusion"
1692	07/2012 Phillyblurbs.com article "Still no instructions for poll workers on voter ID"
1693	08/03/2012 Philadelphia Tribune article "Voter ID Law Especially Hard on Ex-inmates"
1694	08/04/2012 Philly.com article "Getting to voter-id centers a hardship for low-income elderly"
1695	08/04/2012 Philly.com article "PA voter id law may hurt minorities most, study shows"
1696	08/09/2012 Pittsburgh Post-Gazette article "Junk mail, a letter to voters raises more questions about ID"
1697	08/13/2012 Philly.com article "PA turns to social media to educate voters about new law"
1698	08/14/2012 Philly.com article "State ramps up voter ID outreach"
1699	09/22/2012 Philly.com article "Montco to issue voter IDs through nursing home"
1700	10/05/2012 Philly.com article "After ruling, Pa. scrambles to pull voter ID ads"
1701	10/12/2012 Bloomberg article "Confusion sown in Pennsylvania by lingering voter-ID ads"
1702	10/19/2012 Washington Post article "Pa. ads create confusion and fear on voter ID"
1703	11/06/2012 PoliticsPA.com article "Inaccurate PA Dept of State Mailer-Voter ID Required"
1704	1/27/13 CBSPhilly article "Watchdog Group Releases Results of Election Day Survey on Voter ID Law"
1705	Report Provisional Ballot Certified Results 2012 General Election
1706	Report of Provisional Ballots By Rejected Reason 2012 General Election
1707	Official 2012 Presidential General Election Results Report
1708	Pennsylvania Department of State Rejection Form Letters (PA-00116126 - 168)
1709	Pennsylvania Department of State Voter ID Applications with Rejection Form (PA-00116169 -117626; PA-00117679 -118086)
1710	8/1/2012 Email from M. Sweeney to S. Royer et al. re: "URGENT: Questions for testimony Wednesday" (PA-00012596)
1711	1/11/13 Email from J. Cowan to C. Kling re: "Voter ID Education Info" with attachment (PA-01129435)
1712	12/31/12 Email from C. Kling to K. Mattis re: "Voter Education" with attachment
1713	10/17/12 Letter from various state senators to C. Aichele (PA-00113576-78)

1714	Spreadsheet of Election Complaints
1715	Spreadsheet of Number of Voter IDs issued (PennDOT ID for voting purposes and Department of State ID)
1716	Spreadsheet of HUD facilities
1717	7/30/12 Email from T. Fauver to D. Soisson re: "PA Voter I.D. Law - Public Transportation"
1718	7/26/12 Email from TAWC to E. Adams re: "PA Voter I.D. Law - Public Transportation"
1719	7/30/12 Email from M. Heffner to E. Adams re: PA Voter I.D. Law - Public Transportation"
1720	8/3/12 Email from T. Fauver to D. Soisson et al. re: "PA Voter ID Law" (with attachment)
1721	7/25/12 Email from J. Plankenhorn to E. Adams re: "PA Voter ID Law"
1722	8/2/12 Email from K. Kilpatrick to E. Adams re: "PA Voter ID Law" (with attachment)
1723	7/31/12 Email from P. Hogwarth to T. Fauver et al. Re: "PA Voter I.D. Law - Public Transportation"
1724	7/31/ 12 Email from LATS to E. Adams re: "PA Voter I.D. Law - Public Transportation"
1725	7/31/12 Email from J. Tomcho to T. Fauver re: "PA Voter I.D. Law - Public Transportation"
1726	7/30/12 Email from S. Mays to T.Fauver re: "PA Voter I.D. Law - Public Transportation"
1727	7/30/12 Email from P. Baker to E. Adams re: "PA Voter I.D. Law - Public Transportation"
1728	7/30/12 Email from D. Lomison to T. Fauver re: "PA Voter I.D. Law - Public Transportation"
1729	7/30/12 Email from R. Corbin to T. Fauver et al. Re: "PA Voter I.D. Law - Public Transportation"
1730	7/26/12 Email from G. Eby to E. Adams re: "PA Voter I.D. Law - Public Transportation"
1731	7/26/12 Email from J. Paul to E. Adams re: "PA Voter I.D. Law - Public Transportation"
1732	7/26/12 Email from T. Geibel to E. Adams re: "PA Voter I.D. Law - Public Transportation"
1733	7/25/12 Email from D. Kilmer to T. Fauver re: "PA Voter I.D. Law - Public Transportation"
1734	7/25/12 Email from L. Smith to E. Adams re: "PA Voter I.D. Law - Public Transportation"
1735	6/22/12 Email from M.Roncone to T. Fauver re: "PA Voter I.D. Law - Public Transportation"
1736	6/22/12 Email from T. Tulip to T. Fauver re: "PA Voter I.D. Law - Public Transportation"
1737	8/1/12 Email from D. Meyers to T. Fauver et al. Re: "PA Voter I.D. Law - Public Transportation"
1738	"*The 2012 ELection Protection Report, Our Broken Voting System and How to*

	Repair It, The Lawyers Committee for Civil Rights Under the Law, 2013.
1739	4/3/13 PennDOT letter to H. Ginensky (VOTE-00002111-2114)
1740	7/20/12 Email from I. Neveil to S. Royer et al. re: "Media Plan & SIPO, Voter ID General Election 2012" with attachments (VOTE-00002115-2119)
1741	9/20/12 Harmelin Media Memo re: "PA Dept. of State Voter ID: General Election Media Campaign" (VOTE-00002120-2121)
1742	11/15/12 Harmelin Media PowerPoint (VOTE-00002122-155)
1743	7/27/12 Email from S. Royer to I. Neveil et al. re: "Follow up from 7/26 meeting/conference call" (VOTE-00002156-58)
1744	5/4/12 Email from I. Neveil to K. Cummings et al. re: "Harmelin SIPO for General Election Media Plan" with attachments (VOTE-00002159-162)
1745	6/13/13 Email from M. Rutz to M. Rutz re: "Voter Recommendation" (VOTE-00002163-2170)
1746	League of Women Votes schedule (VOTE-00002171-73)
1747	Handwritten call log notes from League of Women Voters (VOTE-00002174-79)
1748	Log of Messages from League of Women Voters (VOTE-00002180-88)
1749	Handwritten call log notes from League of Women Voters (VOTE-00002189-2207)
1750	League of Women Voters Chart of Phone Call Statistics from November 2012 (VOTE-00002208-2219)
1751	League of Women Voters Chart of Phone Call Statistics (VOTE-00002220-28)
1752	League of Women Voters Chart of Phone Call Statistics from December 2012 (VOTE -00002229-2231)
1753	League of Women Voters January 2013 Phone Call Log (VOTE-00002232-236)
1754	League of Women Voters February 2013 Phone Call Log (VOTE-00002237-241)
1755	League of Women Voters March 2013 Phone Call Log (VOTE-00002242-45)
1756	League of Women Voters April 2013 Phone Call Log (VOTE-00002246-49)
1757	League of Women Voters May 2013 Phone Call Log (VOTE-00002250-53)
1758	League of Women Voters June 2013 Phone Call Log (VOTE-00002254)
1759	Pennsylvania Department of Transportation's Response to Petitioner's Third Set of Interrogatories No. 35, PA-000129565
1760	DRAFT- Pending Formal and Approval, dated April 18, 2013 and Exhibits PA-00129571-83
1761	Frequently asked questions pertaining to PA's voter ID law that includes a general information FAQ, a college or university FAQ, a care facility FAQ, a military FAQ, a telephone operator Q&A sheet, the voter identification training agenda, and description of acceptable IDs and how to obtain a PennDOT ID (PA-00004994-5023)
1762	Voter ID Talking Points (PA-00005025-29)
1763	04/17/12 Voter ID talking points for the Chris Stagall Radio Show interview (PA-00005030-35)
1764	04/03/12 PA DOS Request for Quotation for 2012 General Election Voter Education Media Campaign (PA-00005610-643)

1765	Talking Points for Pre-Primary and Election Day Media Interviews (PA-00008802-04)
1766	05/10/12 Email from S. Royer to D. Burgess re: "Re: Wednesday Clips" (PA-00019761-69)
1767	"Bring Photo ID to Vote in November" informational flyer/poster (text only, no graphics) (PA-00020712)
1768	04/10/12 Email from R. Ruman to T. Graham et al. re: "Voter ID outreach" (PA-00028561-62)
1769	"Voter Identification (ID) Education Guide, Action Information Packet" created by the Philadelphia Delegation and Pennsylvania House of Representatives (PA-00030565-30676)
1770	04/27/12 Email from M. Sweeney to S. Royer et al. re: "Voter ID outreach idea" (PA-00032361-62)
1771	04/13/2012 Email from S. Royer to M. Sweeney re: "FOR REVIEW: Voter ID Executive Summary" (PA-00034930)
1772	Draft letter to voters who have been identified as being registered to vote but who do not have a PennDot photo ID (PA-00056477)
1773	Draft letter from C. Aichele to voters informing them of acceptable IDs and that they are entitled to a free PennDot photo ID for voting purposes only (PA-00062696)
1774	09/07/12 Letter from B. Josephs (Democratic State Representative) to C. Aichele re: "offensive and threatening language" used in a commercial about PA's new voter ID law (PA-00084296-97)
1775	08/12 Memorandum by the Pennsylvania Budget and Policy Center titled "Pennsylvania's Identity Crisis, Rushed Implementation of Voter ID Law Putting Voting Rights at Risk" (PA-00089418-439)
1776	07/26/12 Email from M. Sweeney to J. Riley (Bravo Group) et al. re: "RE: Military Outreach-Voter ID Campaign" (PA-00089760-61)
1777	"Show it" print copy describing what IDs are acceptable (PA-00091000)
1778	Draft letter from C. Aichele to voters informing them of acceptable IDs and that they are entitled to a free Pennsylvania Department of Transportation photo ID for voting purposes only (PA-00091313)
1779	08/07/12 Voter ID talking points for the Bill Anderson Live Talk Radio Show interview - Carol Aichele (PA-00091576-580)
1780	08/13/12 "FAQ - Department of State Identification Card" (PA-00095910-11)
1781	Spanish language frequently asked questions pertaining to PA's voter ID law that includes only the general information FAQ (PA-00095912-920)
1782	Spanish language frequently asked questions pertaining to the DOS ID (PA-00095921-22)
1783	07/27/2012 Email from I. Neveil (Harmelin Media) to S. Royer et al. re: "Follow up from 7/26 meeting/conference call" (PA-00098093-94)
1784	Harmelin SIPO (PA-00098095)
1785	Billboard/Transit print ad titled "IF YOU WANT TO VOTE SHOW IT." (PA-00098106)
1786	Billboard/Transit print ad titled "IF YOU WANT TO VOTE SHOW IT." (PA-00098108)

1787	Letter from P. Geho to Members of the PA Legislature re: the creation of DOS IDs and voter outreach efforts (PA-00098615-16)
1788	08/24/12 Document describing the public outreach efforts of the Bravo Group and Skyler Group (PA-00099314-15)
1789	08/22/12 Email from N. Winkler to J. Pena re: "RE: Spanish TV Spot" (PA-00099751)
1790	08/30/12 Email from S. Royer to N. Winkler et al. re: "RE: VotesPA Website" (PA-00099864-65)
1791	08/07/12 Red House Communications script for a thirty second radio spot "IF YOU WANT TO VOTE, SHOW IT!" (PA-00099909)
1792	08/09/12 Red House Communications thirty second television commercial script (PA-00099911)
1793	09/12/12 Draft letter from C. Aichele to B. Josephs (Democratic State Representative) responding to Josephs's letter about the recently aired voter ID commercial (PA-00099915)
1794	Presentation from Harmelin Media titled "Radio Pennsylvania Network, 2012 Voter ID Proposal" (PA-00100236-242)
1795	Presentation by votesPA.com titled "Voter ID Guide" (PA-00102025-2041)
1796	06/26/12 Email from S. Royer to P. Geho et al. re: "Re: Fwd: RE: Any details regarding the DOS statewide advertising campaign…" (PA-00105264-66)
1797	09/18/12 Email from M. Sweeney to V. Brown et al. re: "RE: Voter ID for Veterans" (PA-00106095-96)
1798	09/20/12 Memorandum from M. Rutz (Harmelin Media) to S. Royer re: "PA Dept. of State Voter ID: General Election Media Campaign" (PA-00109026-27)
1799	09/20/12 Memorandum from G. Blint (Red House Communications) to S. Royer re: "Voter ID Education Campaign" (PA-00109029-30)
1800	09/20/2012 Email from S. Royer to B. Dupler re: "FW: Media Documents for Voter ID 2012 General Election" (with attachments) (PA-00109031; PA-00109032-9072; PA-00109073; PA-00109080-96; PA-00109097-9103; PA-00109104-05; PA-00109106-07; PA-00109108-09; PA-00109110-9394; PA-00109395-9400; PA-00109401)
1801	10/07/12 Email from W. Correll to ST, VoterID Questions re: "Misguiding Website" (PA-00113839)
1802	10/05/12 Email from ST, VoterID Questions to R. Evans re: "RE: Remove ID picture please" (PA-00114366)
1803	10/20/12 Email from ST, VoterID Questions to S. Khan re: "RE: Voter ID information" (PA-00114521)
1804	10/11/12 Email from ST, VoterID Questions to E. Lucas re: "RE: Voter Photo ID" (PA-00114615)
1805	09/24/12 Email from C. Solomon to M. Sweeney re: "Telephone Message - Voter ID Issue" (PA-00114764)
1806	Thirty second PSA script titled "Voter ID Education Campaign" featuring C. Aichele (PA-00123846)
1807	11/05/12 Presentation from Harmelin Media titled "2012 general election Media Recap" (PA-00123991-24024)

1808	10/02/12 Recommended revised copy for online banner ads (PA-00124234-35)
1809	10/02/12 revised script for the voter ID television commercial voice over (PA-00124236)
1810	10/2/12 revised script for a thirty second radio spot "IF YOU WANT TO VOTE, SHOW IT!" (PA-00124238-39)
1811	10/2/12 revised script for a thirty second radio spot "IF YOU WANT TO VOTE, SHOW IT!" (PA-00124238-39)
1812	10/03/12 suggested revisions to the thirty second television commercial re: PA voter IDs (PA-00124248-49)
1813	10/3/12 slightly different revised script for a thirty second radio spot "IF YOU WANT TO VOTE, SHOW IT!" (PA-00124250-51)
1814	01/22/13 Email from K. Cummings to H. Barry re: "FW: Status of the Paid Media Campaign" (PA-00124295-96)
1815	Russian language voter ID poster/flyer (PA-00125480)
1816	Korean language voter ID poster/flyer (PA-00125481)
1817	Chinese language voter ID poster/flyer (PA-00125482)
1818	Automated message script describing the DOS ID and other acceptable forms of ID (PA-00125903-04)
1819	Automated message script describing how to receive a free PennDOT ID and describing acceptable forms of ID (PA-00125991)
1820	Spanish language "Muestrala" poster/flyer describing what IDs are acceptable (PA-00091278)
1821	10/02/12 PR Newswire article "Governor Corbett, Secretary Aichele Issue Statements on Court Ruling"
1822	09/28/12 Email from J. McKnight to L. Beachell et al. re: "FW: Voter ID clarification to webpages"
1823	09/21/12 Flyer of PA Driver License Center locations with hours and addresses
1824	8/17/12 Letter from J. Schultz to T. Perez (DOJ) re: the Department of Justice's request for information concerning compliance with the Voting Rights Act
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1890	Can voter id laws be administered in a race-neutral manner? Evidence from the city of Boston in 2008 (Rachael V. Cobb, D. James Greiner, Kevin M. Quinn) (06/14/2010)
1891	The cost of the vote: Poll taxes, voter identification laws, and the price of democracy (Atiba R. Ellis) (02/17/2010)
1892	A new barrier to participation: Heterogeneous application of voter identification policies (Lonna Rae Atkeson, Lisa A. Bryant, Thad E. Hall, Kyle L. Saunders, R. Michael Alvarez) (8/14/2009)
1893	Effects of identification requirements on voting: evidence from the experiences of voters on Election Day (Stephen Ansolabehere) (1/2009)
1894	What We Know About Voter-ID Laws, Registration and Turnout (Majorie Randon Hershey) (1/2009)
1895	The Empirical Effect of Voter Identification Laws on Turnout (Jason Mycoff, Michael Wagner and David Wilson) (1/2009)
1896	The Voter ID Mess: Estimating the Effects of State Voter ID laws on Voter Turnout and Self-Reported Voting Irregularities (Jeff Milyo) (2009)
1897	Voter-identification requirements and the learning curve (Timothy Vercellotti and David Anderson) (2009)
1898	The empirical effects of voter id laws: Present or absent? (Jason Mycoff, Michael Wagner and David Wilson) (2009)
1899	Modeling problems in the voter identification—voter turnout debate (Robert S. Erikson and Lorraine C. Minnite) (2009)
1900	ID at the Polls: Assessing the Impact of Recent State Voter ID Laws on Voter Turnout (Shelley DeAluth) (2009)
1901	Empirically Assessing the Impact of Photo Identification at the Polls Through An Examination of Provisional Ballots (Michael J. Pitts) (10/21/2008)
1902	Voter Identification Studies: Which Study Is Right? (Kim Hilsenbeck, Sarah Park, Alison Prevost and Vassia Gueorguieva) (5/2008)
1903	An empirical Bayes approach to estimating ordinal treatment effects (R. Michael Alvarez, Delia Bailey, and Jonathan A. Katz) (03/28/2008)
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1906	Vote fraud in the eye of the beholder: the role of public opinion in the challenge to voter identification requirements (Stephen Ansolabehere and Nathaniel Persily) (2008)
1907	The Disproportionate Impact of Indiana Voter ID Requirements on the Electorate (Matt A. Barreto, Stephen A. Nuno, Gabriel R. Sanchez)

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1908	The Effects of Photographic Identification on Voter Turnout in Indiana (Jeff Milyo) (11/2007)
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1911	The Effect of Voter Identification Laws on Aggregate and Individual Level Turnout (Jason D. Mycoff, Michael W. Wagner, David C. Wilson) (8/2007)
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1913	Worth a thousand words?: An analysis of Georgia's voter identification statute (M.V. Hood III and Charles Bullock III) (4/2007)
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1916	Citizens Without Proof: A Survey of Americans' Possession of Documentary Proof of Citizenship and Photo Identification (Brennan Center for Justice) (11/2006)
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1919	Protecting the Franchise, or Restricting It?: The Effects of Voter Identification Requirements on Turnout (Timothy Vercellotti and David Anderson) (9/3/2006)
1920	Evidence of Voter Fraud and the Impact That Regulations Have On Voter Participation Rates (John R. Lott Jr.) (8/18/2006)
1921	Report to the U. S. Election Assistance Commission On Best Practices to Improve Voter Identification Requirements Pursuant to the HELP AMERICA VOTE ACT OF 2002 Public Law 107-252 (The Eagleton Institute of Politics, Rutgers, The State University of New Jersey and The Moritz College of Law, The Ohio State University) (6/28/2006)
1922	The Driver License Status of the Voting Age Population in Wisconsin (John Pawasarat) (6/2005)
1923	Preliminary Findings of Joint Task Force Investigating Possible Election Fraud (State of Wisconsin) (4/10/2005)
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1934	7/16/12 Master Outreach List from Bravo (PA-00084898-916) (attached to PA-00084897)
1935	7/16/12 Master Event List from Bravo (PA-00084917-18) (attached to PA-00084897)
1936	9/7/12 Email from J. Riley (Bravo) to M. Sweeney providing Bravo's September 7, 2012 Master Event List, Master Material Requests List, and Master Outreach List (PA-00102314)
1937	9/7/12 Master Event list from Bravo, (PA-00102315-27) (attached to PA-00102314)
1938	9/7/12 Master Outreach list from Bravo (PA-00102328-31) (attached to PA-00102314)
1939	9/7/12 Master Material Requests list from Bravo (PA-00102332-81) (attached to PA-00102314)
1940	Voter ID Education Campaign summary as of June 20 2012 (PA-00061774-75)
1941	RFQ # DOS 2012-4 (June 4 2012) (PA-00063070-98)
1942	RFQ# DOS 2012-3 (June 4 2012) (PA-00063035-55)
1943	8/27/12 Buy Detail Report for Cable TV Ad Buy in Youngstown and Buffalo/Niagara Falls
1944	6/12/13 Voter ID Project Plan
1945	Harmelin flowchart of media campaign
1946	Voter ID Outreach Summary (prepared by M. Sweeney)
1947	9/5/12 Buy Detail Report for statewide ad buy
1948	9/25/12 Email from M. Sweeney to S. Cotelo (Skyler) attaching revised Spanish-language version of Bravo outreach PowerPoint deck
1949	9/25/12 Bravo outreach PowerPoint (Spanish language)
1950	9/21/12 Email from S. Cotelo (Skyler) to M. Sweeney attaching revised Spanish-language version of Bravo outreach PowerPoint deck
1951	9/21/12 Bravo outreach PowerPoint (Spanish language)
1952	5/23/12 Email from S. Royer to M. Sweeney requesting weekly updates of voter ID implementation efforts (PA-00035840)
1953	6/1/12 Email from M. Sweeney to S. Royer attaching voter ID implementation

	weekly report (PA-00061383)
1954	6/1/12 Voter ID Report (May 25, 2012-June 1, 2012) (PA-00061384-87) (attached to PA-00061383)
1955	4/10/12 Email from R. Ruman to T. Graham providing summary of voter ID outreach (PA-00106183-84)
1956	4/13/12 Email from M. Sweeney to B. Dupler attaching a Voter ID Executive Summary and a draft Voter ID project plan (PA-00007091)
1957	4/12/12 draft Voter ID executive summary (PA-00007092-93) (attached to PA-00007091)
1958	4/12/12 draft Voter ID project plan (PA-00007094-110) (attached to PA-00007091)
1959	7/25/12 email from M. Sweeney to S. Royer attaching summary of DOS outreach efforts as of 7/25/12 (PA-00103025)
1960	Summary of DOS outreach efforts as of 7/25/12 (PA-001030256-27) (attached to PA-00103025)
1961	8/6/12 Email from A. Moose to R. Ruman attaching summary of Voter ID Project work as of 7/23/12 (PA-00095215)
1962	Summary of Voter ID project work as of 7.23.12 (PA-00095216-51) (attached to PA-00095215)
1963	8/23/12 Email from S. Royer to C. Aichele attaching a Voter ID Implementation Update as of 8/20/12 (PA-00100167)
1964	Voter ID Implementation Update for August 13-17 2012 (PA-00100168-74)
1965	10/22/12 Email from P. Dillon to M. Sweeney providing summary of Show It campaign budget (PA-00123695-96)
1966	1/22/13 Email from K. Cummings to H. Barry forwarding October 4 2012 email from M. Sweeney to S. Royer, R. Ruman, and others re: status of paid media campaign (PA-00124295-96)
1967	11/2/12 Email from M. Milano to M. Sweeney, N. Winkler, S. Royer, and R. Ruman re: post-injunction question on billboards (PA-00114102-03)
1968	8/10/12 Email from M. Sweeney to S. Shenk and E. Alsvan re: issues at Berwick PennDOT office (PA-00084310)
1969	8/23/12 Email from D. Heisler to M. Sweeney, D. VanBourgondien, and J. Mathis re: issues at Berwick PennDOT (PA-00084308-09)
1970	5/1/12 Email from C. Reese to M. Sweeny and K. O'Donnell re: a Voter ID meeting (PA-00106176-77)
1971	6/25/12 Email from M. Sweeney to P. Geho and R. Oyler re: Voter ID Shared Ride and attaching a PennDOT letter to county Shared Ride programs (PA-00111111)
1972	6/22/12 Letter from PennDOT to county Shared Ride Programs (PA-00111112) (attached to PA-00111111)
1973	6/25/12 Email from K. O'Donnell to M. Sweeney re: transportation to driver licensing centers (PA-00111273-75)
1974	9/7/12 Email from M. Sweeney to J. Riley (Bravo) re: a voter registration event request (PA-00106277)
1975	8/13/12 Email from M. Sweeney to P. Geho re: Rep. Evankovich Voter ID Shuttle (PA-00085205)

1976	9/24/12 Email from S. Connolly to R. Ruman re: college newspaper outreach and attaching a College Newspapers Memo (PA-00113203)
1977	9/21/12 Memorandum from Bravo Group to DOS re: student reporter teleconference (PA-00113204-05) (attached to PA-00113203)
1978	7/17/12 Email from Anna Idler to T. Berger re: a community outreach inquiry (PA-00102568)
1979	10/2/12 DOS Voter ID Conference Call agenda (PA-00125145)
1980	8/14/12 Email from M. Rutz to S. Royer re: TV ad buy in Fulton and Tioga counties (PA-00098114)
1981	8/23/12 Email from M. Rutz to R. Ruman re: TV ad buy in Potter County (PA-00099640)
1982	6/12/12 Purchase Order to Harmelin Media (PA-00063359-64)
1983	Harmelin Final Media Recap 11-15-12
1984	7/20/12 Email from I. Neveil to S. Royer re: budget changes to Harmelin media plan and SIPO (and attaching SIPO and media plan)
1985	Harmelin revised SIPO for Voter ID Campaign (attached to July 20 2012 email)
1986	Harmelin revised media plan (attached to July 20 2012 email)
1987	7/27/12 Email from S. Royer to I. Neveil re: revisions to media plan
1988	10/3/12 Email from M. Sweeney to G. Blint re PSA option for Eagles-Steelers (PA-00124976)
1989	Addendum No. 1 to RFQ No. DOS 2012-4 (PA-00100933)
1990	Addendum No. 1 to RFQ No. DOS 2012-3 (PA-00063032)
1991	10/26/12 Email from C. Aichele to S. Turner, S. Royer, and R. Ruman re: petition from unitedwomen.org (PA-00113645)
1992	Pennsylvania billboard signatures (PA-00113646) (attached to PA-00113645)
1993	Pennsylvania bill board signatures for delivery (PA-00113647) (attached to PA-00113645)
1994	Unitedwomen.org letter to Secretary C. Aichele (PA-00113648-49) (attached to PA-00113645)
1995	Video relating to Philly Restart
1996	Pennsylvania's Voter ID Law - A Guide to ACT 18 of 2012 (Oct. 2, 2012) (PA-00123264-3271)
1997	Pennsylvania's Voter ID Law - A Guide to ACT 18 of 2012 (Spanish) (March 6, 2013)
1998	FAQ - Department of State Identification Card (Spanish) (March 6, 2013)
1999	Pennsylvania's Voter ID Law - A Guide to ACT 18 of 2012 (Spanish) (Oct. 5, 2012)
2000	FAQ - Department of State Identification Card (Sept. 25, 2012) (PA-00124325-4326)
2001	FAQ - Military Voters (Oct. 2 2012) (PA-00124308-4309)
2002	FAQ - Using a Care Facility ID to Vote in Person (Oct. 2, 2012) (PA-00124310-15)
2003	FAQ - Using a College or University ID to Vote (Oct. 2, 2012) (PA-00124316-4318)

2004	FAQ - Employee IDs and Local Government IDs (Oct. 2, 2012) (PA-00124319-4320)
2005	FAQ - Employee IDs and Local Government IDs (April 18, 2012) (PA-00005895-5896)
2006	FAQ - Homeless Voters - Voting in Person (Oct. 2, 2012) (PA-00124321-4324)
2007	FAQ - Homeless Voters - Voting in Person (April 18, 2012) (PA-00005897-5900)
2008	Harmelin Media reports regarding TV ad buy
2009	Voter ID Guide (PowerPoint presentation)

Applewhite, et al. v. Commonwealth of Pennsylvania, et al.
No. 330 MD 2012

EXHIBIT 4

Petitioners' Pre-Trial Statement And Application For Special Relief In The Nature Of A Preliminary Injunction

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

Viviette Applewhite, et al.,,	)	
	)	
Petitioners,	)	
v.	)	
	)	
	)	Docket No. 330 MD 12
The Commonwealth of Pennsylvania, et al.,	)	
Respondents.	)	

STIPULATION

Petitioners and Respondents, by and through their undersigned counsel, hereby stipulate as follows:

1. There have been no investigations or prosecutions of in-person voter fraud in Pennsylvania; and the parties do not have direct personal knowledge of any such investigations or prosecutions in other states;

2. The parties are not aware of any incidents of in-person voter fraud in Pennsylvania and do not have direct personal knowledge of in person voter fraud elsewhere;

3. Respondents will not offer any evidence in this action that in-person voter fraud has in fact occurred in Pennsylvania or elsewhere;

4. The sole rationale for the Photo ID law that will be introduced by Respondents is that contained in Respondents' Amended answer to Interrogatory 1, served June 7, 2012.

5. Respondents will not offer any evidence or argument that in person voter fraud is likely to occur in November 2012 in the absence of the Photo ID law.

6. Neither the Governor nor the Attorney General will testify at the hearing on this matter.

By: Patrick S. Cawley	By:
Patrick S. Cawley, Esq. Senior Deputy Attorney General Civil Litigation Section 15th Floor, Strawberry Square Harrisburg, PA 17120 Attorney for Respondents	Jennifer R. Clarke Public Interest Law Center of Philadelphia 1709 Benjamin Franklin Parkway, 2nd Floor Philadelphia PA 19103 Attorney for Petitioners

Date: July 12, 2012

Applewhite, et al. v. Commonwealth of Pennsylvania, et al.
No. 330 MD 2012

EXHIBIT 5

Petitioners' Pre-Trial Statement And Application For Special Relief In The Nature Of A Preliminary Injunction

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

Viviette Applewhite, et al., Petitioners, v. The Commonwealth of Pennsylvania, et al., Respondents.	Docket No. 330 MD 12

STIPULATION REGARDING PENNDOT WEB SEARCHES

The parties hereby stipulate that Petitioners' Exhibit 235 (attached hereto as Exhibit A) is an authentic and admissible print-out from the Pennsylvania Department of Transportation ("PennDOT") website showing the search criteria for identifying PennDOT Driver License Centers that issue Photo ID Cards which can be used for voting purposes and for identifying counties that do not have a Driver License Center that issues Photo ID Cards which can be used for voting purposes.

The parties further stipulate that Petitioners' Exhibit 234 (attached hereto as Exhibit B) is an authentic and admissible print out from the PennDOT website showing the results of the searches described in Exhibit 235.

The parties further stipulate that Exhibit 234 shows that there is no PennDOT Driver License Center to issue photo identifications which can be used for voting purposes in the following Pennsylvania counties: Cameron, Clinton, Forest, Fulton, Juniata, Montour, Perry Sullivan, and Union.

The parties further stipulate that Exhibit 234 shows that the PennDot Driver License Center that issues photo identifications which can be used for voting purposes is open one day per week in the following counties: Columbia, Clarion, Wayne, Huntingdon, Carbon, Mifflin, Pike, Bradford, Susquehanna, Northumberland, Wyoming, Greene, and Tioga.

The parties further stipulate that Exhibit 234 shows that the PennDOT Driver License Center that issues photo identifications which can be used for voting purposes is open two days per week in the following counties: Armstrong, Potter, Bedford, Westmoreland, McKean, Indiana, Jefferson, Venango, Elk, and Warren.

The parties further stipulate that Exhibit 234 shows that the PennDOT Driver License Center that issues photo identifications which can be used for voting purposes in Wayne County is open on

Tuesdays and will not be open during the six calendar days following the November 6, 2012 election, but will be open on the Tuesday following the election.

This stipulation does not address the driver license centers that are open three, four, or five days per week.

By: Patrick S. Cawley Patrick S. Cawley Senior Deputy Attorney General Civil Litigation Section 15th Floor, Strawberry Square Harrisburg, PA 17120 Attorney for Respondents	By: Michael A. Rubin Arnold & Porter LLP 555 Twelfth Street, NW Washington, DC 20004-1206 Attorney for Respondents

Date: July 25, 2012

Exhibit A

Online Driver and Vehicle Services
Information Centers
Business Partners
About this Site
Security on this Site
Home
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Search this Site

Tom Corbett, Governor

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

Locations Info Center

Looking for a Driver License or Photo Center, On-Line Messenger Service Center, Third Party CDL Tester or Temporary Authority Agent in your area? You've come to the right place! Search from your zip code and see the approximate driving distance, or search by selecting a county. Just follow the three easy steps below.

NOTE: Please check hours of operation before visiting any Driver License or Photo Center. Also, for a listing of Driver License and Photo Center holiday closings, please click here. PennDOT does not publish individual Driver License and Photo Center telephone numbers. If you need assistance pertaining to a particular PennDOT Driver License or Photo Center, our Driver and Vehicle Services Customer Call Center staff will gladly assist you. Please call 1-800-932-4600 for assistance.

NOTE: Please contact On-Line Messengers directly to verify their hours of operation. On-Line Messengers charge a service fee in addition to PennDOT's standard driver and vehicle services fees. On-Line Messenger service fees are set by each individual messenger service and may vary. *There is no additional fee for customers who are having **only** their photo taken at a photo center located at an On-Line Messenger.*

PennDOT Driver License and Photo License Centers only accept payment by check or money order. No cash or credit cards are accepted

To find a location near you, please follow the directions below:

Step 1: Choose Where You Want to Search:

(Choose One Below)

You can search one of three ways. You may search for service centers, on-line messenger services and license plate recycling locations by entering your 5 digit zip code, selecting a county, or by state.

- **To search by zip code** type in all five digits of the zip code and optionally limit by the maximum distance you select.
- **To search by county** select the county from the list.
- **To search all centers in the state** select 'Yes' to option (C) Search the entire state?

(A.) Search by ZIP Code and Proximity

ZIP Code:

Proximity: Closest

(B.) Search by County

County:

Tip: *You can quickly select a county by clicking on the county dropdown list then pressing the first letter of the county until it appears in the list.*

(C.) Search the entire state? Yes No

Step 2: Choose the Services You Need:

(Check All That Apply)

Not all locations provide all driver and vehicle services. It is very important that you tell us what you want to do by checking the box next to the desired service.

You may check as many services as you wish; however, keep in mind that Locator will return service centers that are able to offer **all the combined services** you selected. If you would like to view a description of these services, please visit our Explanation of Services page.

Driver's License/Photo ID Services:

Basic,3 Year and 10 Year Driving Records	Motorcycle Skills Test
Full Driver History	3-Wheeled Motorcycle Skills Test
CDL Learner's Permits / Transfers	New Resident Driver's License / Transfer
Commercial Knowledge Test	Non-Commercial Knowledge Test
Commercial Skills Test A	Non-Commercial Skills Test
Commercial Skills Test B	Photo ID Card
Commercial Skills Test C	Photo ID Card Duplicate/Replacement
Driver's License Duplicate / Replacement	Photo for your Driver's License / ID card (must bring camera card)
Driver's License / Photo ID Address Change	Post Restoration Fees / Proof of Insurance for DL Suspensions
Driver's License / Photo ID Card Renewal	Restoration Requirements Letter
Learner's Permits	School Bus Skills Test
Motorcycle Knowledge Test	Special Point Exams

Vehicle Services:

DARE / Zoo / Wildlife Special Fund Plates	Retired Status Registration Renewals
Duplicate Titles	Temporary Commercial Registration Credential
Heavy Truck Renewal	Transfer Vehicle Registration
Insurance Restoration	Vehicle Registration Address Change
New Resident Title and Transfer	Vehicle Registration Duplicate / Replacement
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Restoration Requirements Letter

Step 3: **Start the Search Below:**

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Tom Corbett, Governor

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

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- **To search all centers in the state** select 'Yes' to option (C) Search the entire state?

(A.) Search by ZIP Code and Proximity

ZIP Code:

Proximity: Closest

(B.) Search by County

County: Clinton

Tip: *You can quickly select a county by clicking on the county dropdown list then pressing the first letter of the county until it appears in the list.*

(C.) Search the entire state? Yes ○ No

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(Check All That Apply)

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Commercial Skills Test A	Non-Commercial Skills Test
Commercial Skills Test B	Photo ID Card
Commercial Skills Test C	Photo ID Card Duplicate/Replacement
Driver's License Duplicate / Replacement	Photo for your Driver's License / ID card (must bring camera card)
Driver's License / Photo ID Address Change	Post Restoration Fees / Proof of Insurance for DL Suspensions
Driver's License / Photo ID Card Renewal	Restoration Requirements Letter
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- **To search all centers in the state** select 'Yes' to option (C) Search the entire state?

(A.) Search by ZIP Code and Proximity

ZIP Code:

Proximity: Closest

(B.) Search by County

County: Cameron

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(C.) Search the entire state? Yes ◦ No

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Commercial Skills Test A	Non-Commercial Skills Test
Commercial Skills Test B	Photo ID Card
Commercial Skills Test C	Photo ID Card Duplicate/Replacement
Driver's License Duplicate / Replacement	Photo for your Driver's License / ID card (must bring camera card)
Driver's License / Photo ID Address Change	Post Restoration Fees / Proof of Insurance for DL Suspensions
Driver's License / Photo ID Card Renewal	Restoration Requirements Letter
Learner's Permits	School Bus Skills Test
Motorcycle Knowledge Test	Special Point Exams

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DARE / Zoo / Wildlife Special Fund Plates	Retired Status Registration Renewals
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- **To search all centers in the state** select 'Yes' to option (C) Search the entire state?

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ZIP Code:

Proximity: Closest

(B.) Search by County

County: Forest

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☐ CDL Learner's Permits / Transfers	☐ New Resident Driver's License / Transfer
☐ Commercial Knowledge Test	☐ Non-Commercial Knowledge Test
☐ Commercial Skills Test A	☐ Non-Commercial Skills Test
☐ Commercial Skills Test B	☑ Photo ID Card
☐ Commercial Skills Test C	☐ Photo ID Card Duplicate/Replacement
☐ Driver's License Duplicate / Replacement	☐ Photo for your Driver's License / ID card (must bring camera card)
☐ Driver's License / Photo ID Address Change	☐ Post Restoration Fees / Proof of Insurance for DL Suspensions
☐ Driver's License / Photo ID Card Renewal	☐ Restoration Requirements Letter
☐ Learner's Permits	☐ School Bus Skills Test
☐ Motorcycle Knowledge Test	☐ Special Point Exams

Vehicle Services:

☐ DARE / Zoo / Wildlife Special Fund Plates	☐ Retired Status Registration Renewals
☐ Duplicate Titles	☐ Temporary Commercial Registration Credential
☐ Heavy Truck Renewal	☐ Transfer Vehicle Registration
☐ Insurance Restoration	☐ Vehicle Registration Address Change
☐ New Resident Title and Transfer	☐ Vehicle Registration Duplicate / Replacement
☐ Request for Vehicle Information	☐ Vehicle Registration Renewal

Restoration Requirements Letter

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Tom Corbett, Governor Barry J. Schoch, P.E., Secretary, Department of Transportation

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- **To search all centers in the state** select 'Yes' to option (C) Search the entire state?

(A.) Search by ZIP Code and Proximity

ZIP Code:

Proximity: Closest

(B.) Search by County

County: Juniata

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Commercial Knowledge Test	Non-Commercial Knowledge Test
Commercial Skills Test A	Non-Commercial Skills Test
Commercial Skills Test B	Photo ID Card
Commercial Skills Test C	Photo ID Card Duplicate/Replacement
Driver's License Duplicate / Replacement	Photo for your Driver's License / ID card (must bring camera card)
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Restoration Requirements Letter

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PennDOT Driver License and Photo License Centers only accept payment by check or money order. No cash or credit cards are accepted.

To find a location near you, please follow the directions below:

Step 1: Choose Where You Want to Search:

(Choose One Below)

You can search one of three ways. You may search for service centers, on-line messenger services and license plate recycling locations by entering your 5 digit zip code, selecting a county, or by state.

- **To search by zip code** type in all five digits of the zip code and optionally limit by the maximum distance you select.
- **To search by county** select the county from the list.
- **To search all centers in the state** select 'Yes' to option (C) Search the entire state?

(A.) Search by ZIP Code and Proximity

ZIP Code:

Proximity: Closest

(B.) Search by County

County: Montour

Tip: *You can quickly select a county by clicking on the county dropdown list then pressing the first letter of the county until it appears in the list.*

(C.) Search the entire state? Yes ○ No

Step 2: Choose the Services You Need:

(Check All That Apply)

Not all locations provide all driver and vehicle services. It is very important that you tell us what you want to do by checking the box next to the desired service.

You may check as many services as you wish; however, keep in mind that Locator will return service centers that are able to offer **all the combined services** you selected. If you would like to view a description of these services, please visit our Explanation of Services page.

Driver's License/Photo ID Services:

Basic,3 Year and 10 Year Driving Records	Motorcycle Skills Test
Full Driver History	3-Wheeled Motorcycle Skills Test
CDL Learner's Permits / Transfers	New Resident Driver's License / Transfer
Commercial Knowledge Test	Non-Commercial Knowledge Test
Commercial Skills Test A	Non-Commercial Skills Test
Commercial Skills Test B	Photo ID Card
Commercial Skills Test C	Photo ID Card Duplicate/Replacement
Driver's License Duplicate / Replacement	Photo for your Driver's License / ID card (must bring camera card)
Driver's License / Photo ID Address Change	Post Restoration Fees / Proof of Insurance for DL Suspensions
Driver's License / Photo ID Card Renewal	Restoration Requirements Letter
Learner's Permits	School Bus Skills Test
Motorcycle Knowledge Test	Special Point Exams

Vehicle Services:

DARE / Zoo / Wildlife Special Fund Plates	Retired Status Registration Renewals
Duplicate Titles	Temporary Commercial Registration Credential
Heavy Truck Renewal	Transfer Vehicle Registration
Insurance Restoration	Vehicle Registration Address Change
New Resident Title and Transfer	Vehicle Registration Duplicate / Replacement
Request for Vehicle Information	Vehicle Registration Renewal

Restoration Requirements Letter

Step 3: **Start the Search Below:**

SEARCH

Tom Corbett, Governor

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

Locations Info Center

Looking for a Driver License or Photo Center, On-Line Messenger Service Center, Third Party CDL Tester or Temporary Authority Agent in your area? You've come to the right place! Search from your zip code and see the approximate driving distance, or search by selecting a county. Just follow the three easy steps below.

NOTE: Please check hours of operation before visiting any Driver License or Photo Center. Also, for a listing of Driver License and Photo Center holiday closings, please click here. PennDOT does not publish individual Driver License and Photo Center telephone numbers. If you need assistance pertaining to a particular PennDOT Driver License or Photo Center, our Driver and Vehicle Services Customer Call Center staff will gladly assist you. Please call 1-800-932-4600 for assistance.

NOTE: Please contact On-Line Messengers directly to verify their hours of operation. On-Line Messengers charge a service fee in addition to PennDOT's standard driver and vehicle services fees. On-Line Messenger service fees are set by each individual messenger service and may vary. *There is no additional fee for customers who are having **only** their photo taken at a photo center located at an On-Line Messenger.*

PennDOT Driver License and Photo License Centers only accept payment by check or money order. No cash or credit cards are accepted.

To find a location near you, please follow the directions below:

Step 1: Choose Where You Want to Search:

(Choose One Below)

You can search one of three ways. You may search for service centers, on-line messenger services and license plate recycling locations by entering your 5 digit zip code, selecting a county, or by state.

- **To search by zip code** type in all five digits of the zip code and optionally limit by the maximum distance you select.
- **To search by county** select the county from the list.
- **To search all centers in the state** select 'Yes' to option (C) Search the entire state?

(A.) Search by ZIP Code and Proximity

ZIP Code:

Proximity: Closest

(B.) Search by County

County: Sullivan

Tip: *You can quickly select a county by clicking on the county dropdown list then pressing the first letter of the county until it appears in the list.*

(C.) Search the entire state? Yes ○ No

Step 2: Choose the Services You Need:

(Check All That Apply)

Not all locations provide all driver and vehicle services. It is very important that you tell us what you want to do by checking the box next to the desired service.

You may check as many services as you wish; however, keep in mind that Locator will return service centers that are able to offer **all the combined services** you selected. If you would like to view a description of these services, please visit our Explanation of Services page.

Driver's License/Photo ID Services:

Basic,3 Year and 10 Year Driving Records	Motorcycle Skills Test
Full Driver History	3-Wheeled Motorcycle Skills Test
CDL Learner's Permits / Transfers	New Resident Driver's License / Transfer
Commercial Knowledge Test	Non-Commercial Knowledge Test
Commercial Skills Test A	Non-Commercial Skills Test
Commercial Skills Test B	Photo ID Card
Commercial Skills Test C	Photo ID Card Duplicate/Replacement
Driver's License Duplicate / Replacement	Photo for your Driver's License / ID card (must bring camera card)
Driver's License / Photo ID Address Change	Post Restoration Fees / Proof of Insurance for DL Suspensions
Driver's License / Photo ID Card Renewal	Restoration Requirements Letter
Learner's Permits	School Bus Skills Test
Motorcycle Knowledge Test	Special Point Exams

Vehicle Services:

DARE / Zoo / Wildlife Special Fund Plates	Retired Status Registration Renewals
Duplicate Titles	Temporary Commercial Registration Credential
Heavy Truck Renewal	Transfer Vehicle Registration
Insurance Restoration	Vehicle Registration Address Change
New Resident Title and Transfer	Vehicle Registration Duplicate / Replacement
Request for Vehicle Information	Vehicle Registration Renewal

Restoration Requirements Letter

Step 3: **Start the Search Below:**

SEARCH

Tom Corbett, Governor

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

Locations Info Center

Looking for a Driver License or Photo Center, On-Line Messenger Service Center, Third Party CDL Tester or Temporary Authority Agent in your area? You've come to the right place! Search from your zip code and see the approximate driving distance, or search by selecting a county. Just follow the three easy steps below.

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PennDOT Driver License and Photo License Centers only accept payment by check or money order. No cash or credit cards are accepted.

To find a location near you, please follow the directions below:

Step 1: Choose Where You Want to Search:

(Choose One Below)

You can search one of three ways. You may search for service centers, on-line messenger services and license plate recycling locations by entering your 5 digit zip code, selecting a county, or by state.

- **To search by zip code** type in all five digits of the zip code and optionally limit by the maximum distance you select.
- **To search by county** select the county from the list.
- **To search all centers in the state** select 'Yes' to option (C) Search the entire state?

(A.) Search by ZIP Code and Proximity

ZIP Code:

Proximity: Closest

(B.) Search by County

County: Union

Tip: *You can quickly select a county by clicking on the county dropdown list then pressing the first letter of the county until it appears in the list.*

(C.) Search the entire state? Yes ○ No

Step 2: Choose the Services You Need:

(Check All That Apply)

Not all locations provide all driver and vehicle services. It is very important that you tell us what you want to do by checking the box next to the desired service.

You may check as many services as you wish; however, keep in mind that Locator will return service centers that are able to offer **all the combined services** you selected. If you would like to view a description of these services, please visit our Explanation of Services page.

Driver's License/Photo ID Services:

Basic,3 Year and 10 Year Driving Records	Motorcycle Skills Test
Full Driver History	3-Wheeled Motorcycle Skills Test
CDL Learner's Permits / Transfers	New Resident Driver's License / Transfer
Commercial Knowledge Test	Non-Commercial Knowledge Test
Commercial Skills Test A	Non-Commercial Skills Test
Commercial Skills Test B	Photo ID Card
Commercial Skills Test C	Photo ID Card Duplicate/Replacement
Driver's License Duplicate / Replacement	Photo for your Driver's License / ID card (must bring camera card)
Driver's License / Photo ID Address Change	Post Restoration Fees / Proof of Insurance for DL Suspensions
Driver's License / Photo ID Card Renewal	Restoration Requirements Letter
Learner's Permits	School Bus Skills Test
Motorcycle Knowledge Test	Special Point Exams

Vehicle Services:

DARE / Zoo / Wildlife Special Fund Plates	Retired Status Registration Renewals
Duplicate Titles	Temporary Commercial Registration Credential
Heavy Truck Renewal	Transfer Vehicle Registration
Insurance Restoration	Vehicle Registration Address Change
New Resident Title and Transfer	Vehicle Registration Duplicate / Replacement
Request for Vehicle Information	Vehicle Registration Renewal

Restoration Requirements Letter

Step 3: **Start the Search Below:**

SEARCH

Exhibit B

pennsylvania DEPARTMENT OF TRANSPORTATION

Driver & Vehicle Services

pennsylvania PA | PA STATE AGENCIES | ONLINE SERVICES | HOME | Forms & Publications | Shopping Cart

Tom Corbett, Governor — Barry J. Schoch, P.E., Secretary, Department of Transportation

Locator Search Results

New Search

Search Selections

Location: Entire State
Services: Photo ID Card

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

Allison Park

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: Duncan Manor Shopping Center
1701 Duncan Avenue
Allison Park, PA 15101
County: Allegheny
Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	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	8:45am-10:30am	8:45am-9:45am	8:45am-10:30am	8:45am-10:30am	8:45am-10:00am

* 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: Take McKnight Rd. Right onto Peebles/Green Rd. Right onto Duncan Ave. Shopping Cntr on left.

Map: Interactive mapping by MAPQUEST 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

Altoona

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: 1738A 9th Avenue
Altoona, PA 16601
County: Blair
Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	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 **	Closed	8:30am-4:15pm **	8:30am-4:15pm **

Best Times To Visit	Closed	Continuous Customer Flow	11:00 am-12:00pm	Driver Exam Closed; Photo License Open	Continuous Customer Flow	2:30pm-4:00pm

* 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: Corner of 9th and 19th Aves. Use 17th Street exit from Rt. 99.

Map: Interactive mapping by MAPQUEST 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

Arch Street

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: 801 Arch Street
Philadelphia, PA 19107
County: Philadelphia
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 Customer Flow	Continuous Customer Flow	Continuous Customer Flow	Continuous Customer Flow	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.

Map: Interactive mapping by MAPQUEST 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

Bedford

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: Bedford Plaza
Route 30
Bedford, PA 15522
County: Bedford
Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	Closed	8:30am-4:15pm *	Closed	8:30am-4:15pm *	8:30am-4:15pm *
Driver	Closed	Closed	9:00am-	Closed	9:00am-	Closed

License Center			3:00pm **		3:00pm **	
Best Times To Visit	Closed	Closed	12:00am-1:00pm	Closed	12:00am-1:00pm	12:00am-1:00pm

* 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: Bedford East on Rt. 30. Under tpk on right hand side in Old Ames Plaza.

Contact Us

Belle Vernon

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: 960 Rostraver Road
Tri-County Plaza
Belle Vernon, PA 15012
County: Westmoreland
Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	8:30am-4:15pm *	8:30am-4:15pm	8:30am-6:00pm *	8:30am-4:15pm *	8:30am-4:15pm *
Driver License Center	Closed	Closed	8:30am-4:15pm **	8:30am-4:15pm **	Closed	Closed
Best Times To Visit	Closed	Driver Exam Closed; Photo License Open	8:45am-9:45am	8:45am-9:45am	Driver Exam Closed; Photo License Open	Driver Exam Closed; Photo License Open

* 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: I-70 to Fayatte City exit to 201 S. Lower level of Tri-County Plaza.

Map: Interactive mapping by MAPQUEST 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

Bensalem

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: 4201 Neshaminy Blvd.
Bensalem, PA 19020
County: Bucks
Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	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	8:30am-9:15 am	8:30am-9:15am	8:30am-9:15am	8:30am-9:15am	8:30am-9:15am

* 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: Located in Neshaminy Square Shopping Ctr. Exit 28 from tpk.

Map: Interactive mapping by MAPQUEST 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

Berwick

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: 101B Mulberry & West 10th Sts.
Berwick, PA 18603
County: Columbia
Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	Closed	Closed	8:30am-4:15pm *	Closed	8:30am - 4:15pm *
Driver License Center	Closed	Closed	Closed	9:15am-3:30pm **	Closed	Closed
Best Times To Visit	Closed	Closed	Closed	1:00pm-2:30pm	Closed	Driver Exam Closed; Photo License Open

* 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: I-80 to Berwick exit to Rt 11 N to Mulberry St. Turn left. Go down to 10th St.

Map: Interactive mapping by MAPQUEST 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

Bradford

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: 68 Chestnut Street
Bradford, PA 16701
County: McKean
Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	8:30am-4:15pm	Closed	Closed	Closed	8:30am-4:15pm
Driver License	Closed	8:30am-4:15pm	Closed	Closed	Closed	8:30am-4:15pm

Center		**				**
Best Times To Visit	Closed	1:00pm-4:00pm	Closed	Closed	Closed	1:00pm-4:00pm

* 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: Route 219 N to Elm St exit. Turn left. Next stop sign, turn right.

Map: Interactive mapping by MAPQUEST 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

Bridgeville

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: Chartiers Valley Shopping Ctr.
1025 Washington Pike Rt 50
Bridgeville, PA 15017
County: Allegheny

Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	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	10:30am-11:30am	10:15am-11:15am	9:45am-10:45am	11:00am-12:00pm	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: I-70 to I-79 N. Take Kirwan Hgts Exit, Turn right @ light onto Rt. 50 East.

Map: Interactive mapping by MAPQUEST 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

Butler

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: Point Plaza Shopping Center
Route 356 and 68
Butler, PA 16001
County: Butler

Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	8:30am-4:15pm	8:30am-4:15pm	8:30am-6:00pm *	8:30am-4:15pm	8:30am-4:15pm
Driver License	Closed	8:30am-4:15pm	8:30am-4:15pm**	8:30am-4:15pm**	8:30am-4:15pm	8:30am-4:15pm

Center	**			**	**	
			CDL Skills Testing conducted Thursdays only			
Best Times To Visit	Closed	9:00am-11:00am	9:00am-11:00am	9:00am-11:00am	9:00am-11:00am	9:00am-11:00am

* 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: Rt. 356/New Castle Rd. Left at first light into Shopping Center. Center is across from KFC.

Contact Us

Carlisle

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: Stonehedge Square
950 Walnut Bottom Road
Carlisle, PA 17013
County: Cumberland

Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	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 Customer Flow	8:30am-11:00am	1:30pm-3:00pm	Continuous Customer Flow	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: I-81 to exit 45.

Map: Interactive mapping by MAPQUEST 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

Chambersburg

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: 190 Mill Road
Chambersburg, PA 17201
County: Franklin

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

	Mon	Tues	Wed	Thurs	Fri	Sat
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 Customer Flow	Continuous Customer Flow	Continuous Customer Flow	Continuous Customer Flow	2:30pm-4:00pm

* 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: Rt. 11 S. Take a right to Mill Rd.

Map: Interactive mapping by MAPQUEST 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

Clarion

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: Clarion Mall
Rt. 68 & I-80
Clarion, PA 16214
County: Clarion

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	8:30am-4:15pm *	8:30am-4:15pm *	Closed	8:30am-4:15pm *	8:30am-4:15pm *
Driver License Center	Closed	Closed	10:00am-4:15pm **	Closed	Closed	Closed
Best Times To Visit	Closed	Driver Exam Closed; Photo License Open	2:00-4:00 pm	Closed	Driver Exam Closed; Photo License Open	Driver Exam Closed; Photo License Open

* 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: I-80 and Route 68, beside hospital

Contact Us

Clearfield

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: Clearfield Mall
1800 Daisy Street
Clearfield, PA 16830
County: Clearfield

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	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 **	Closed	Closed	8:30am-4:15pm **	8:30am-4:15pm **
Best Times To Visit	Closed	2:00pm-4:00pm	Driver Exam Closed; Photo License Open	Driver Exam Closed; Photo License Open	2:00pm-4:00pm	2:00pm-4:00pm

* 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: I-80 Exit 19. South to Rt. 322 East. In Ames Mall.

Map: Interactive mapping by MAPQUEST 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

Columbus Blvd.

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: Columbus Blvd.
1530 S. Columbus Blvd.
Philadelphia, PA 19147
County: Philadelphia

Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	8:30am-4:15pm	8:30am-4:15pm	8:30am-4:15pm	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 Customer Flow	9:30am-1:15pm	9:30am-1:15pm	9:30am-1:15pm	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: I-95 to Exit 16 (Columbus Blvd) to Tasker St.

Map: Interactive mapping by MAPQUEST 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

Coudersport

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: 1 S. Main Street
Coudersport, PA 16915
County: Potter

Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo	Closed	8:30am-	8:30am-	Closed	Closed	8:30am-

License Center		4:15pm *	4:15pm *			4:15pm *
Driver License Center	Closed	9:30am-4:15pm **	9:30am-4:15pm **	Closed	Closed	Closed
Best Times To Visit	Closed	1:00pm-4:00pm	1:00pm-4:00pm	Closed	Closed	Driver Exam Closed; Photo License Open

* 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: Off Rt 6. Intersection of Rt. 6 and Allegheny Ave.

Map: Interactive mapping by MAPQUEST 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

Dublin

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: Dublin Village Plaza
161 N. Main Street
Dublin, PA 18917
County: Bucks

Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	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 Customer Flow	9:00am-11:00 am	9:00am-11:00 am	9:00am-11:00 am	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: Rt. 309 to 313 E. 12 miles on left hand side.

Map: Interactive mapping by MAPQUEST 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

Dunmore

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: 81 Keystone Industrial Park
Dunmore, PA 18512
County: Lackawanna

Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	8:30am-4:15pm *	12:00pm-7:45pm	8:30am-4:15pm *	8:30am-4:15pm	8:30am-4:15pm
Driver License Center	Closed	Closed	12:00pm-7:45pm Comm. Knowledge Test till 6:00 **	Closed **	8:30am-4:15pm **	8:30am-4:15pm **
Best Times To Visit	Closed	Driver Exam Closed; Photo License Open	Continuous Customer Flow	Driver Exam Closed; Photo License Open	11:00am-12:00pm	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: Interstate 81 to Exit 188. Follow the blue and white signs for the State Police barracks; the PennDOT Photo and Exam Center is located next to the State Police barracks.

Map: Interactive mapping by MAPQUEST 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

East Rochester

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: 149 Stewart Ave
East Rochester, PA 15074
County: Beaver
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	9:00am-10:00am	9:00am-10:00am	9:00am-11:00am	9:00am-10:00am	9:00am-10:00 am

* 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: Off Route 65, 100 yds. past Monaca Bridge. Right onto Stewart Ave. First building on right.

Map: Interactive mapping by MAPQUEST 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

Easton

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: Easton Driver License Center
2473 Nazareth Road
25th Street Shopping Center
Easton, PA 18045
County: Northampton
Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	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 Customer Flow	Continuous Customer Flow	Continuous Customer Flow	Continuous Customer Flow	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: Route 22 to the 25th Street exit, PA Route 248 West
Map: Interactive mapping by MAPQUEST 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

Elizabethville

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: 4686 State Route 209
Suite 5
Elizabethville, PA 17023
County: Dauphin
Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	Closed	Closed	8:30am-4:15pm *	Closed	8:30am-4:15pm *
Driver License Center	Closed	Closed	Closed	9:15am-3:45pm **	Closed	Closed
Best Times To Visit	Closed	Closed	Closed	11:00am-12:00pm	Closed	Driver Exam Closed; Photo License Open

* 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: Rt 225 to stop light. Turn right onto Rt. 209.
Map: Click on the MapQuest graphic to display a

Interactive mapping by MAPQUEST map for this location. The service center is represented by the red star at the center of the map.

Contact Us

Erie

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: Summit Towne Centre
7200 Peach Street
Erie, PA 16509
County: Erie
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	Driver Exam Closed; Photo License Open	10:00am-12:00pm	10:00am-12:00pm	2:00pm-4:00pm	9:00am-11:00am	2:00pm-4:00pm

* 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: From interstate 90 take Exit 24 US 19/Peach St. Go North on US 19/Peach St to Rotunda Dr, turn left into Summit Towne Center (near Sam's Club).

Map: Interactive mapping by MAPQUEST 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

Frazer/Malvern

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: Lincoln Court Shopping Center
225 West Lancaster Ave
Malvern, PA 19355
County: Chester
Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	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	9:30am-10:30am	1:30pm-3:00pm	9:00am-11:00am	9:30am-11:00am	9:00am-10:30am

* 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: From Rt 100 North or South, to Business Rt 30 East to Lincoln Court Shopping Center. From 202 North or South, Rt 401 (Frazer) exit, go south to 2nd light at Malin Rd, make a left onto Malin Rd and go to the shopping center

Map: Interactive mapping by MAPQUEST 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

Gettysburg

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: 59 North 5th Street
Gettysburg, PA 17325
County: Adams
Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	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 Customer Flow	Continuous Customer Flow	Continuous Customer Flow	1:30pm-2:30pm	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: Rt 30 E of Gettysburg. Left on N. 5th Street. Center is on the left hand side beside the VFW.

Map: Interactive mapping by MAPQUEST 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

Greensburg

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: 770 East Pittsburgh Street
The Davis Center
Greensburg, PA 15601
County: Westmoreland
Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	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	8:30am-9:30am	8:30am-9:30am	8:30am-9:30am	8:30am-9:30am	8:30am-9:30am

* 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: Rt 30 E to Pleasant Unity exit.

Map: Interactive mapping by MAPQUEST 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

Harrisburg

Top ▲

Type: Counter at the ROC
Facility: PennDOT Customer Counter at the Riverfront Office Center
Address: Riverfront Office Center
1101 S. Front Street
Harrisburg, PA 17104
County: Dauphin
Hours:

General Services Mon - Fri	7:30 AM - 4:30 PM
General Services Sat	8:00 AM - 12 Noon (Renewals Only)

Directions: From Interstate 83 to Exit 44A (13th Street). Follow signs.

Map: Interactive mapping by MAPQUEST 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

Harrisburg

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: Riverfront Office Center
1101 South Front Street
Harrisburg, PA 17104
County: Dauphin
Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	7:30am-4:30pm *	7:30am-4:30pm	7:30am-4:30pm	7:30am-6:00pm *	7:30am-4:30pm	7:30am-4:30pm
Driver License Center	Closed	7:30am-4:30pm **	7:30am-4:30pm **	7:30am-4:30pm **	7:30am-4:30pm **	7:30am-4:30pm **
Best Times To Visit	Closed	Continuous Customer Flow	7:30am-11:00am 1:15pm-2:45pm	7:30am-11:45am 1:00pm-3:00pm	Continuous Customer Flow	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: From Interstate 83 to Exit 44A (13th Street). Follow signs.

Map: Interactive mapping by MAPQUEST 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

Hazleton

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: 1052 S. Church Street
Hazleton, PA 18201
County: Luzerne
Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	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 **	Closed	Closed	8:30am-4:15pm **
Best Times To Visit	Closed	Continuous Customer Flow	1:00pm-2:30pm	Driver Exam Closed; Photo License Open	Driver Exam Closed; Photo License Open	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: Rt 309 south of Hazleton.
Map: Interactive mapping by MAPQUEST 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

Honesdale

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: 18 Collan Park
Suite A
Honesdale, PA 18431
County: Wayne
Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	8:30am-4:15pm *	Closed	Closed	Closed	8:30am-4:15pm *
Driver License Center	Closed	9:15am-3:30pm **	Closed	Closed	Closed	Closed
Best Times To Visit	Closed	11:30 am-12:00 pm	Closed	Closed	Closed	Driver Exam Closed; Photo License Open

* 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: Rt 191 next to State Police barracks.
Map: Click on the MapQuest graphic to display a

Interactive mapping by MAPQUEST map for this location. The service center is represented by the red star at the center of the map.

Contact Us

Huntingdon

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: M.A.T. Plaza, Suite 12
Rt. 22
Huntingdon, PA 16652
County: Huntingdon
Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	Closed	Closed	8:30am-4:15pm *	Closed	8:30am-4:15pm *
Driver License Center	Closed	Closed	Closed	9:00am-3:00pm **	Closed	Closed
Best Times To Visit	Closed	Closed	Closed	11:00am-1:00pm	Closed	Driver Exam Closed; Photo License Open

* 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: Rt 22

Please be advised: The Huntingdon Driver License Center is located in the Altoona area and should not be confused with the Huntingdon Valley Driver License Center located in the Philadelphia area.

Contact Us

Huntingdon Valley

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: Market Place @ Huntingdon Val
2022 County Line Road
Huntingdon Valley, PA 19006
County: Montgomery
Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	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 Customer 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: Rt 611 to County Line Rd. East on County Line Rd to exam site.

Please be advised: The Huntingdon Valley Driver License Center is located in the Philadelphia area and should not be confused with the Huntingdon Driver License Center located in the Altoona area.

Map: Interactive mapping by MAPQUEST 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

Indiana

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: Indiana Mall
Rt. 286 & Warren Rd Unit 110
Indiana, PA 15701
County: Indiana
Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	8:30am-4:15pm *	8:30am-4:15pm *	8:30am-6:00pm *	8:30am-4:15pm *	8:30am-4:15pm *
Driver License Center	Closed	9:15am-4:15pm **	Closed	9:15am-4:15pm **	Closed	Closed
Best Times To Visit	Closed	1:00pm-3:00pm	Driver Exam Closed; Photo License Open	1:00pm-3:00pm	Driver Exam Closed; Photo License Open	Driver Exam Closed; Photo License Open

* 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: Route 422 to Route 286 to Mall

Contact Us

Island Avenue

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: 2320 Island Avenue
Philadelphia, PA 19153
County: Philadelphia
Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	8:30am-4:15pm *	8:30am-4:15pm	8:30am-4:15pm	8:30am-4:15pm	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 Customer Flow	10:00am-12:00pm	10:00am-12:00pm	11:30am-1:00pm	3:30pm-4:15pm

* 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: I-95 South to Island Ave exit. At dead end, turn right. Near KFC restaurant.

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

Johnstown

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: 563 Walters Avenue
Johnstown, PA 15901
County: Cambria
Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	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	1:30pm-2:30pm	10:00am-11:00am	10:00am-11:00am	10:00am-11:00am	1:30pm-2:30pm

* 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: Rt. 219 to 56 W to Walter Ave exit. Follow blue & white signs.

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

Lancaster

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: Regency Square Shopping Center
131 Rohrerstown Rd.
Lancaster, PA 17603
County: Lancaster
Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	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 Customer Flow	9:00am-11:00am	9:00am-11:00am	Continuous Customer Flow	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.

Map: Interactive mapping by MAPQUEST 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

Lawndale

Top ▲

Type: PennDOT Exam Center
Facility: PennDOT Exam Center
Address: Oxford Levick Shopping Center
919-B Levick Street
Philadelphia, PA 19111
County: Philadelphia
Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Driver License Center	Closed	8:30am-4:15pm **	8:30am-5:15pm **	8:30am-5:15pm **	8:30am-4:15pm **	8:30am-4:15pm **
Best Times To Visit	Closed	Continuous Customer Flow	Continuous Customer Flow	Continuous Customer Flow	Continuous Customer Flow	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: Rt 1 S to Levick Street. Turn west on Levick St.
Map: Interactive mapping by MAPQUEST 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

Lebanon

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: 900 East Cumberland Street
Lebanon, PA 17042
County: Lebanon
Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	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 Customer Flow	10:00am-2:00pm	10:00am-2:00pm	Continuous Customer Flow	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: Rt 422 E. to Cumberland St. Center is on right.
Map: Click on the MapQuest graphic to display a

Interactive mapping by MAPQUEST map for this location. The service center is represented by the red star at the center of the map.

Contact Us

Lehigh Valley

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: Lehigh Valley Driver Center
1710 Hoover Avenue
Allentown, PA 18109
Website: www.yurconic.com
County: Lehigh
Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	8:30am-4:15pm	8:30am-4:15pm	8:30am-4:15pm	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 Customer Flow	Continuous Customer Flow	Continuous Customer Flow	Continuous Customer Flow	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: Airport Rd. South exit, off Rt. 22.
Map: Interactive mapping by MAPQUEST 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

Lehighton

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: 1403 Blakeslee Blvd. Dr. East
Route 443
Lehighton, PA 18235
County: Carbon
Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	Closed	Closed	8:30am-4:15pm *	8:30am-4:15pm *	8:30am-4:15pm *
Driver License Center	Closed	Closed	Closed	Closed	9:30am-3:15pm **	Closed
Best Times To Visit	Closed	Closed	Closed	Driver Exam Closed; Photo License Open	11:30am-1:00pm	Driver Exam Closed; Photo License Open

* 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: Rt 209 W to Rt 443 W.

Map: Interactive mapping by MAPQUEST 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

Lewistown

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: 13187 Ferguson Valley Road
Yeagertown, PA 17099

County: Mifflin

Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	Closed	Closed	8:30am-4:15pm	Closed	8:30am-4:15pm *
Driver License Center	Closed	Closed	Closed	8:30am-4:15pm **	Closed	Closed
Best Times To Visit	Closed	Closed	Closed	11:00am-12:00pm	Closed	Driver Exam Closed; Photo License Open

* 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: 322 W to Burnam-Yeagertown exit. Turn left at end of ramp.

Map: Interactive mapping by MAPQUEST 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

Meadville

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: 16942 Patricia Drive
Meadville, PA 16335

County: Crawford

Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	Closed	8:30am-4:15pm *	8:30am-4:15pm	8:30am-4:15pm	8:30am-4:15pm
Driver License Center	Closed	Closed	Closed	8:30am-4:15pm **	8:30am-4:15pm **	8:30am-4:15pm **
Best Times To Visit	Closed	Closed	Driver Exam Closed; Photo License Open	12:00pm-2:00pm	12:00pm-2:00pm	12:00pm-2:00pm

* 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: Route 19, 1 mile South of 322

Map: Interactive mapping by MAPQUEST 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

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 Customer 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.

Map: Interactive mapping by MAPQUEST 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

Mercer

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: 519B Greenville Road
Mercer, PA 16137
County: Mercer
Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	8:30am-4:15pm *	8:30am-4:15pm *	8:30am-6:00pm *	8:30am-4:15pm *	8:30am-4:15pm *
Driver License Center	Closed	9:30am-4:15pm **	Closed	9:30am-4:15pm **	Closed	9:30am - 4:15pm on 1st, 3rd, and 5th

						Sat of Month **
Best Times To Visit	Closed	2:00pm-4:00pm	Driver Exam Closed; Photo License Open	1:00pm-3:00pm	Driver Exam Closed; Photo License Open	2:00pm-4:00 pm

* 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: Rt 58, Rear of bldg.

Map: Interactive mapping by MAPQUEST 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

Milford

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: Old Milford School Commons
201 West Harford Street
Milford, PA 18337
County: Pike

Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	Closed	Closed	8:30am-4:15pm *	Closed	8:30am - 4:15pm *
Driver License Center	Closed	Closed	Closed	9:30am-3:15pm **	Closed	Closed
Best Times To Visit	Closed	Closed	Closed	Continuous Customer Flow	Closed	Driver Exam Closed; Photo License Open

* 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: I-84 to Milford exit. Across from post office.

Map: Interactive mapping by MAPQUEST 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

Monroeton

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: Rt. 220 By-Pass
Towanda Monroeton Road

Monroeton, PA 18832

County: Bradford

Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	Closed	Closed	8:30am-4:15pm *	8:30am-4:15pm *	8:30am-4:15pm *
Driver License Center	Closed	Closed	Closed	8:30am-3:00pm **	Closed	Closed
Best Times To Visit	Closed	Closed	Closed	1:00pm-2:00pm	Driver Exam Closed; Photo License Open	Driver Exam Closed; Photo License Open

* 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: Rt. 220, 1/2 mile North of Monroeton.

Contact Us

Montrose

Top ▲

Type: PennDOT Photo & Exam Center

Facility: PennDOT Photo & Exam Center

Address: 78 Grow Avenue
Montrose, PA 18801

County: Susquehanna

Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	Closed	Closed	8:30am-4:15pm *	Closed	8:30am-4:15pm *
Driver License Center	Closed	Closed	Closed	9:30am-3:15pm **	Closed	Closed
Best Times To Visit	Closed	Closed	Closed	11:30am - 12:30pm	Closed	Driver Exam Closed; Photo License Open

* 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: I-81 to Exit 67. Rt 706 turns into Grow Ave.

Map: Interactive mapping by MAPQUEST 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

New Castle

Top ▲

Type: PennDOT Photo & Exam Center

Facility: PennDOT Photo & Exam Center

Address: 973 Old Youngstown Rd.

New Castle, PA 16101
County: Lawrence
Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	Closed	8:30am-4:15pm	8:30am-4:15pm *	8:30am-4:15pm	8:30am-4:15pm *
Driver License Center	Closed	Closed	8:30am-4:15pm **	Closed	8:30am-4:15pm **	8:30am-4:15pm 2nd and 4th Sat of Month**
Best Times To Visit	Closed	Closed	2:00pm-4:00pm	Driver Exam Closed; Photo License Open	2:00pm-4:00pm	2:00pm-4:00pm

* 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: 3 miles west of New Castle on Old Rt. 422.
Map: Interactive mapping by MAPQUEST 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

New Kensington

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: 1600 Greensburg Road
New Kensington, PA 15068
County: Westmoreland
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	9:00am-11:00am	9:00am-11:00am	9:00am-10:00am	9:00am-11:00am	9:00am-10:00am

* 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: 3.5 miles outside of New Kensington on Rt.366
Map: Interactive mapping by MAPQUEST 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

Norristown

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: 2101 Swede Road
Norristown, PA 19401
County: Montgomery
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 Customer 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: Germantown Pike to Swede Rd.

Map: Interactive mapping by MAPQUEST 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

Penn Hills

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: Penn Hills Shopping Center
11620 Keleket Drive
Pittsburgh, PA 15235
County: Allegheny
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	8:45am-10:00am	8:45am-10:00am	8:45am-10:00am	8:45am-10:00am	8:45am-10:00am

* 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: I-376 W to PA 791 N.(Penn Hills/Rodi Rd. Exit 11). Follow Rodi Rd. 1 mile. Shopping Cntr. on left.

Map: Interactive mapping by MAPQUEST 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

Pittsburgh

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: 708 Smithfield Street
Pittsburgh, PA 15222
County: Allegheny
Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	8:30am-4:15pm	8:30am-4:15pm	8:30am-4:15pm	8:30am-4:15pm	8:30am-4:15pm	Closed
Driver License Center	8:30am-4:15pm **	8:30am-4:15pm **	8:30am-4:15pm **	8:30am-4:15pm **	8:30am-4:15pm **	Closed
Best Times To Visit	Continuous Customer Flow	10:00am-11:00am	10:00am-11:00am	10:00am-11:00am	10:00am-11:00am	Closed

* 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: I-376W to Exit 71B and merge onto Second Ave Turn right at Ross St. Make an immediate left onto Court Pl. Turn right at Grant St. Turn left at 6th Ave. Turn right at Smithfield St. Driver License and Photo Center is located at the corner of Smithfield St and 7th Ave in the Commerce Building.

Map: Interactive mapping by MAPQUEST 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

Punxsutawney

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: Punxsutawney Plaza
Rt. 36
Punxsutawney, PA 15767
County: Jefferson
Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	Closed	Closed	8:30am-4:15pm *	8:30am-4:15pm	8:30am-4:15pm
Driver License Center	Closed	Closed	Closed	Closed	8:30am-4:15pm **	8:30am-4:15pm **
Best Times To Visit	Closed	Closed	Closed	Driver Exam Closed; Photo License Open	1:00pm-3:00pm	2:00pm-4:00pm

* 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: Route 36 to Punxsutawney Plaza

Contact Us

Reading

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: 530 East Lancaster Avenue
Shillington, PA 19607
County: Berks
Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	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	Winter 8:30am-11:30am	Winter 8:30am-11:30am	Winter 8:30am-11:30am	Winter 8:30am-11:30am	
Best Times To Visit			Summer 8:30am-10:30am	Summer 8:30am-10:30am		Summer 2:00pm-4:15pm

* 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: Rt. 222 to Lancaster Ave. 3 blocks south of Reading City limits. In Shillington Shopping Cnt.
Map: Interactive mapping by MAPQUEST 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

Rockview/Pleasant Gap

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: 812 West College Avenue
Pleasant Gap, PA 16823
County: Centre
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 Customer Flow	2:00pm-3:00pm	Continuous Customer Flow	Continuous Customer Flow	2:30pm-3:30pm

* 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: Off Rt. 26 outside of Pleasant Gap.
Map: Click on the MapQuest graphic to display a map for this location. The service center is

Interactive mapping by MAPQUEST represented by the red star at the center of the map.

Contact Us

Schuylkill Haven

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: 972 East Main Street
Schuylkill Haven, PA 17972
County: Schuylkill
Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	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 **	Closed	Closed	8:30am-4:15pm **
Best Times To Visit	Closed	11:00am-12:00pm	11:00am-12:00pm	Driver Exam Closed; Photo License Open	Driver Exam Closed; Photo License Open	2:30pm-4:00pm

* 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: Rt 61
Map: Interactive mapping by MAPQUEST 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

Selinsgrove

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: 1015 Rt 522 South
Selinsgrove, PA 17870
County: Snyder
Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	8:30am-4:15pm	8:30am-4:15pm	Closed	8:30am-4:15pm	8:30am-4:15pm
Driver License Center	Closed	8:30am-4:15pm	8:30am-4:15pm	Closed	8:30am-4:15pm	8:30am-4:15pm
Best Times To Visit	Closed	Continuous Customer Flow	10:00am-11:00am	Closed	Continuous Customer Flow	3:00pm-4:15pm

* 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: Rt 522 across from state hospital.

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

Seneca

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: 143 Airport Road
Seneca, PA 16346
County: Venango
Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	8:30am-4:15pm	8:30am-4:15pm	Closed	Closed	8:30am-4:15pm *
Driver License Center	Closed	8:30am-4:15pm **	8:30am-4:15pm **	Closed	Closed	Closed
Best Times To Visit	Closed	1:00pm-3:00pm	1:00pm-3:00pm	Closed	Closed	Driver Exam Closed; Photo License Open

* 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: Rt 257 and Airport Rd
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

Shamokin

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: Anthra Plaza, Rt. 901
Shamokin, PA 17872
County: Northumberland
Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	Closed	Closed	8:30am-4:15pm *	8:30am-4:15pm *	8:30am-4:15pm *
Driver License Center	Closed	Closed	Closed	Closed	9:00am-3:45pm **	Closed
Best Times To Visit	Closed	Closed	Closed	Driver Exam Closed; Photo License Open	11:00am-12:00pm	Driver Exam Closed; Photo License Open

* 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: Rt 61 in Shamokin in Scotts Plaza.

Contact Us

Snydersville

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: 4218 Manor Drive
Stroudsburg, PA 18360
County: Monroe
Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	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 **	Closed	8:30am-4:15pm **	8:30am-4:15pm **
Best Times To Visit	Closed	Continuous Customer Flow	Continuous Customer Flow	Driver Exam Closed; Photo License Open	Continuous Customer Flow	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: I-80 or Rt 33 to Snydersville Exit.
Map: Interactive mapping by MAPQUEST 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

Somerset

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: 5593 Glades Pike
Somerset, PA 15501
County: Somerset
Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	8:30am-4:15pm	Closed	8:30am-4:15pm	Closed	8:30am-4:15pm
Driver License Center	Closed	8:30am-4:15pm **	Closed	8:30am-4:15pm **	Closed	8:30am-4:15pm **
Best Times To Visit	Closed	1:00pm-2:00pm	Closed	1:00pm-2:00pm	Closed	2:00pm-3:00pm

* 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: Rt 31 East.

Map: Interactive mapping by MAPQUEST 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

St. Mary's

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: 129 North Michael Street
Rt. 255
St. Mary's, PA 15857
County: Elk
Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	Closed	8:30am-4:15pm *	8:30am-4:15pm *	Closed	8:30am-4:15pm *
Driver License Center	Closed	Closed	9:30am-4:15pm **	9:30am-4:15pm **	Closed	Closed
Best Times To Visit	Closed	Closed	10:00am-2:00pm	10:00am-2:00pm	Closed	Closed

* 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: Route 255 N to St. Mary's Square. Basement Level

Map: Interactive mapping by MAPQUEST 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

Tunkhannock

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: 600 Hunter Highway, Suite 12
Tunkhannock, PA 18657
County: Wyoming
Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	Closed	Closed	Closed	8:30am-4:15pm *	8:30am-4:15pm *
Driver License Center	Closed	Closed	Closed	Closed	9:30am-3:15pm **	Closed
Best Times To Visit	Closed	Closed	Closed	Closed	10:30am-11:30am	Driver Exam Closed; Photo License Open

* 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: At Rt 29 & Rt 6, go south to shopping plaza.

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

Uniontown

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: North Gallatin Avenue Ext
855 N Gallatin Ave
Uniontown, PA 15401
County: Fayette
Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	8:30am-4:15pm	8:30am-4:15pm	8:30am-4:15pm *	8:30am-4:15pm	8:30am-4:15pm
Driver License Center	Closed	8:30am-4:15pm **	8:30am-4:15pm **	Closed	8:30am-4:15pm **	8:30am-4:15pm **
Best Times To Visit	Closed	9:00am-10:00am	9:00am-10:00am	Driver Exam Closed; Photo License Open	9:00am-10:00am	3:00pm-4:00pm

* 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: Rt 119 N to Gallatin Ave exit.

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

Warren

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: 984 Hatch Run Road
Warren, PA 16365
County: Warren
Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	Closed	Closed	8:30am-4:15pm *	8:30am-4:15pm *	8:30am-4:15pm *
Driver License Center	Closed	Closed	Closed	9:30am-4:15pm **	9:30am-4:15pm **	Closed
Best Times To Visit	Closed	Closed	Closed	1:00pm-3:00pm	1:00pm-3:00pm	Driver Exam Closed; Photo License Open

* 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: Rt 62 N to Hatch Run Rd Exit, 1 mile

Map: Interactive mapping by MAPQUEST 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

Washington

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: 250 Oak Spring Road
Oak Spring Center
Washington, PA 15301
County: Washington
Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	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	8:45am-9:45am	10:00am-11:00am	11:00am-12:00pm	8:45am-10:00am	10:00am-11:00am

* 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.

Map: Interactive mapping by MAPQUEST 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

Waynesburg

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: Arbor Terrace
1164 Willow Street
Waynesburg, PA 15370
County: Greene
Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	Closed	Closed	8:30am-4:15pm *	Closed	8:30am-4:15pm *
Driver License Center	Closed	Closed	Closed	9:15am-3:30pm **	Closed	Closed
Best Times To Visit	Closed	Closed	Closed	1:30pm-2:30pm	Closed	Driver Exam Closed; Photo

License Open

* 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: Rt 21 to Willow Street. Near police barracks.

Map: Interactive mapping by MAPQUEST 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

Wellsboro

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: 40 Plaza Lane
Wellsboro, PA 16901
County: Tioga
Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	Closed	8:30am-4:15pm *	Closed	Closed	8:30am-4:15pm *
Driver License Center	Closed	Closed	9:00am-3:30pm **	Closed	Closed	Closed
Best Times To Visit	Closed	Closed	2:00pm-3:00pm	Closed	Closed	Driver Exam Closed; Photo License Open

* 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: Rt 15 N to Rt 6 W.

Map: Interactive mapping by MAPQUEST 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

West Kittanning

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: Highlands Office Complex
Rt. 422, Butler Road
West Kittanning, PA 16201
County: Armstrong
Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	Closed	8:30am-4:15pm	8:30am-4:15pm *	8:30am-4:15pm	8:30am-4:15pm *
Driver License	Closed	Closed	8:30am-4:15pm	Closed	8:30am-4:15pm	Closed

Center			**		**	
Best Times To Visit	Closed	Closed	8:45am-10:15am	Driver Exam Closed; Photo License Open	8:45am-10:15am	Driver Exam Closed; Photo License Open

* 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: Route 422 to Route 268, 1 mile to Highlands Office Complex. Between Rlyn Tire Service & 84 Lumber.

Contact Us

West Oak Lane

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: 7121 Ogontz Avenue
Philadelphia, PA 19138
County: Philadelphia

Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	8:30am-4:15pm *	8:30am-4:15pm	8:30am-4:15pm	8:30am-4:15pm	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 **

* 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: Left on Ogontz Ave. Center is on the left side.

Map: Interactive mapping by MAPQUEST 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

Wilkes-Barre

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: 1085 Hanover Street
Hanover Ind. Estates
Wilkes-Barre, PA 18706
County: Luzerne

Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	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 **	Closed	8:30am-4:15pm **
Best Times To	Closed	Continuous Customer Flow	10:30am-11:30am	10:30am-11:30am	Driver Exam Closed;	Continuous Customer Flow

Visit						Photo License Open

* 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: I-81 Exit 164 follow signs

Map: Interactive mapping by MAPQUEST 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

Williamsport

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: 1782 E. 3rd Street
Williamsport, PA 17701
County: Lycoming
Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	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 **	Closed	Closed	8:30am-4:15pm **	8:30am-4:15pm **
Best Times To Visit	Closed	Continuous Customer Flow	Driver Exam Closed; Photo License Open	Driver Exam Closed; Photo License Open	10:00am-11:00am	3:00pm-4:15pm

* 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: I-180 to Faxon Exit

Map: Interactive mapping by MAPQUEST 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

York

Top ▲

Type: PennDOT Photo & Exam Center
Facility: PennDOT Photo & Exam Center
Address: South York Value Center
2130 South Queen Street
York, PA 17403
County: York
Hours:

	Mon	Tues	Wed	Thurs	Fri	Sat
Photo License Center	Closed	8:30am-4:15pm	8:30am-4:15pm	8:30am-4:15pm	8:30am-4:15pm	8:30am-4:15pm
Driver	Closed	8:30am-	8:30am-	8:30am-	8:30am-	8:30am-

License Center	4:15pm **	4:15pm **	4:15pm **	4:15pm **	4:15pm **	
Best Times To Visit	Closed	Continuous Customer Flow	Continuous Customer Flow	Continuous Customer Flow	8:30am-12:00pm	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: I-83 S to Exit 16B (old 6W) (N Queen St). Left at Tyler Run Rd.

Map: Interactive mapping by MAPQUEST 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

Important Information

- Please take your signed temporary license, Social Security Number and another form of identification containing your signature when you go to process your photo license.
- Acceptable forms of signature identification include:
  1. PENNSYLVANIA: Driver's License, Photo ID Card, Photo Welfare Card
  2. PHOTOGRAPHIC ID: Military, Bank, Employee, School, Out-of-State License
  3. DOCUMENTS: Passport, Citizenship or Naturalization, Weapons Permit
  4. NON-PHOTO: Voter's Registration, Medicare Card, Pennsylvania Learner's Permit or Temporary Driver's License, Vehicle Registration
- You may go to the Driver License or Photo License Center of your choice.
- Vehicle Code Tests, Vision Screening and Road Tests may be taken at any of the Driver License Center locations listed. No examinations will be conducted on Mondays.
- The locations, days and times listed under each center are subject to change. If you have any questions concerning the Driver License Centers, please call 1-800-932-4600. Out-of-state please call 1-717-412-5300. People using TDD equipment should call 1-800-228-0676. Out-of-state please call 1-717-412-5380.
- The Department is required to obtain the licensee's Social Security Number under the provisions of sections 1510(a) and/or 1609(a)(4) of the Pennsylvania vehicle code. You will be required to provide your Social Security Number as identifying information in an attempt to minimize driver license fraud. Federal law permits the use of the Social Security Number by state licensing officials for the purpose of identification.

Please check business hours before visiting any Driver License or Photo License Center. Also, for a listing of Driver License and Photo License Center holiday closings, please click here. If you are planning to visit one of PennDOT's On-line Messenger Service Centers, please call ahead for hours of operation during holidays.

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Press your browser's Back button to return to the Locator with the same search parameters.

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

Locator Search Results

New Search

Search Selections

Location: Clinton County

Services: Photo ID Card

Sorry, we could not locate any service centers in the specified location that offer *all* the services that you requested.

What Now?

- If you searched by zip code and entered a mileage range, try selecting a larger range or the "Closest" option.
- If you searched by county, try a neighboring county or a zip code search.
- If you specified multiple services then there may not be a single service center that offers all the services you requested. Try multiple searches on single service requirements.

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

Locator Search Results

New Search

Search Selections

Location: Cameron County

Services: Photo ID Card

Sorry, we could not locate any service centers in the specified location that offer *all* the services that you requested.

What Now?

- If you searched by zip code and entered a mileage range, try selecting a larger range or the "Closest" option.
- If you searched by county, try a neighboring county or a zip code search.
- If you specified multiple services then there may not be a single service center that offers all the services you requested. Try multiple searches on single service requirements.

New Search

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

Locator Search Results

New Search

Search Selections

Location: Forest County

Services: Photo ID Card

Sorry, we could not locate any service centers in the specified location that offer *all* the services that you requested.

What Now?

- If you searched by zip code and entered a mileage range, try selecting a larger range or the "Closest" option.
- If you searched by county, try a neighboring county or a zip code search.
- If you specified multiple services then there may not be a single service center that offers all the services you requested. Try multiple searches on single service requirements.

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

Locator Search Results

New Search

Search Selections

Location: Juniata County

Services: Photo ID Card

Sorry, we could not locate any service centers in the specified location that offer *all* the services that you requested.

What Now?

- If you searched by zip code and entered a mileage range, try selecting a larger range or the "Closest" option.
- If you searched by county, try a neighboring county or a zip code search.
- If you specified multiple services then there may not be a single service center that offers all the services you requested. Try multiple searches on single service requirements.

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Tom Corbett, Governor

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

Locator Search Results

New Search

Search Selections

Location: Montour County

Services: Photo ID Card

Sorry, we could not locate any service centers in the specified location that offer *all* the services that you requested.

What Now?

- If you searched by zip code and entered a mileage range, try selecting a larger range or the "Closest" option.
- If you searched by county, try a neighboring county or a zip code search.
- If you specified multiple services then there may not be a single service center that offers all the services you requested. Try multiple searches on single service requirements.

New Search

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Tom Corbett, Governor

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

Locator Search Results

New Search

Search Selections

Location: Sullivan County

Services: Photo ID Card

Sorry, we could not locate any service centers in the specified location that offer *all* the services that you requested.

What Now?

- If you searched by zip code and entered a mileage range, try selecting a larger range or the "Closest" option.
- If you searched by county, try a neighboring county or a zip code search.
- If you specified multiple services then there may not be a single service center that offers all the services you requested. Try multiple searches on single service requirements.

New Search

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Tom Corbett, Governor

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

Locator Search Results

New Search

Search Selections

Location: Union County

Services: Photo ID Card

Sorry, we could not locate any service centers in the specified location that offer *all* the services that you requested.

What Now?

- If you searched by zip code and entered a mileage range, try selecting a larger range or the "Closest" option.
- If you searched by county, try a neighboring county or a zip code search.
- If you specified multiple services then there may not be a single service center that offers all the services you requested. Try multiple searches on single service requirements.

New Search

Press your browser's Back button to return to the Locator with the same search parameters.

Tom Corbett, Governor Barry J. Schoch, P.E., Secretary, Department of Transportation

Locator Search Results

Search Selections New Search

Location: Perry County
Services: Photo ID Card

Sorry, we could not locate any service centers in the specified location that offer *all* the services that you requested.

What Now?

- If you searched by zip code and entered a mileage range, try selecting a larger range or the "Closest" option.
- If you searched by county, try a neighboring county or a zip code search.
- If you specified multiple services then there may not be a single service center that offers all the services you requested. Try multiple searches on single service requirements.

New Search

Press your browser's Back button to return to the Locator with the same search parameters.

Tom Corbett, Governor Barry J. Schoch, P.E., Secretary, Department of Transportation

Locator Search Results

Search Selections New Search

Location: Fulton County
Services: Photo ID Card

Sorry, we could not locate any service centers in the specified location that offer *all* the services that you requested.

What Now?

- If you searched by zip code and entered a mileage range, try selecting a larger range or the "Closest" option.
- If you searched by county, try a neighboring county or a zip code search.
- If you specified multiple services then there may not be a single service center that offers all the services you requested. Try multiple searches on single service requirements.

New Search

Press your browser's Back button to return to the Locator with the same search parameters.

Applewhite, et al. v. Commonwealth of Pennsylvania, et al.
No. 330 MD 2012

EXHIBIT 6

Petitioners' Pre-Trial Statement And Application For Special Relief In The Nature Of A Preliminary Injunction

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

Viviette Applewhite, et al., Petitioners, v. The Commonwealth of Pennsylvania, et al., Respondents.	Docket No. 330 MD 12

STIPULATION OF AUTHENTICITY OF VIDEO

The parties hereby stipulate that the video obtained from the following link http://www.youtube.com/watch?v=87NN5sdqNt8 and preserved on a CD, a copy of which is being provided from Petitioners' Counsel to Respondents' Counsel, is an authentic recording of a statement by House Majority Leader Representative Mike Turzai made in Republican State Committee meetings on or about June 23, 2012.

The parties also hereby stipulate that the video obtained from the following link http://www.youtube.com/watch?v=U2-dI3CEIt8 and preserved on a CD, a copy of which is being provided from Respondents' Counsel to Petitioners' Counsel, is an authentic recording of a statement by House Majority Leader Representative Mike Turzai made on the floor of the Pennsylvania House of Representatives on March 13, 2012 and transcribed in the official Legislative Journal for that day at page 373.

The parties reserve the right to object to the admissibility of either video.

By: Patrick S. Cawley Patrick S. Cawley, Esq. Senior Deputy Attorney General Civil Litigation Section 15th Floor, Strawberry Square Harrisburg, PA 17120 Attorney for Respondents	By: Dorian Hurley Arnold & Porter LLP 555 Twelfth Street, NW Washington, DC 20004-1206 Attorney for Respondents

Date: July 19, 2012

Applewhite, et al. v. Commonwealth of Pennsylvania, et al.
No. 330 MD 2012

EXHIBIT 7

Petitioners' Pre-Trial Statement And Application For Special Relief In The Nature Of A Preliminary Injunction

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

Viviette Applewhite; Wilola Shinholster Lee; Gloria Cuttino; Nadine Marsh; Bea Bookler; Joyce Block; 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 M.D. 2012

STIPULATION

1. The parties hereby stipulate that the attached documents labeled Exhibits A through J are authentic copies of the material described in this paragraph.

   a. Exhibit A is a copy of two pages of the *Legislative Journal* for Tuesday, March 13, 2012, relating to proceedings of the Pennsylvania House of Representatives.

   b. Exhibit B is a copy of a one-page letter dated March 20, 2012, from State Rep. Daryl D. Metcalfe to U.S. Rep. Robert Brady.

   c. Exhibit C is a copy of a one-page screen shot of a page of webpage containing a statement dated March 27, 2012, issued by Rep. Metcalfe, summarizing the letter that is attached as Exhibit B.

   d. Exhibit D is a copy of a one-page screen shot of a page of a website containing a statement dated July 18, 2012, issued by Rep. Metcalfe.

   e. Exhibit E is a CD that contains an audio recording made on or about August 15, 2012, and a written transcript that reflects the contents of this audio recording, containing the voice of Rep. Metcalfe recorded for a radio program.

   f. Exhibit E-1 is a CD that contains an audio recording made on or about September 20, 2012, containing the voice of Rep. Metcalfe recorded for a radio program.

   g. Exhibit F is a two-page copy of an article appearing on or about September 27, 2012, in the *Pittsburgh Tribune-Review* that accurately quotes Rep. Metcalfe.

h. Exhibit G is a copy of a two-page chain of e-mail messages, all messages dated March 6, 2013.

i. Exhibit H is a copy of a two-page chain of e-mail messages, all dated March 6, 2013.

j. Exhibit I is a copy of a one-page letter dated October 26, 2012, from Rep. Metcalfe to the Secretary of the Commonwealth.

k. Exhibit J is a copy of a one-page letter dated November 1, 2012, from the Secretary of the Commonwealth to Rep. Metcalfe.

2. The parties stipulate that the authenticity of each of the exhibits described in ¶ 1 has been verified by Rep. Metcalfe, acting through his legal counsel.

3. The parties stipulate that Rep. Metcalfe will not testify by deposition or at trial in this matter.

4. It is expressly understood that in signing this stipulation, the parties do not waive any objections to the admissibility of the exhibits or the contents thereof, except that the parties waive any objection to the authenticity of the exhibits.

By: Timothy P. Keating Timothy P. Keating, Esq. Senior Deputy Attorney General Civil Litigation Section 15th Floor, Strawberry Square Harrisburg, PA 17120 Attorney for Respondents	By: Michael Rubin Arnold & Porter LLP 555 Twelfth Street, NW Washington, DC 20004-1206 Witold J. Walczak ACLU of Pennsylvania 313 Atwood Street Pittsburgh, PA 15213 Jennifer R. Clarke Public Interest Law Center of Philadelphia 1709 Benjamin Franklin Parkway, 2nd Floor Philadelphia PA 19103 Marian K. Schneider Advancement Project 295 E. Swedesford Road #348 Wayne, PA 19087 Attorneys for Petitioners

Date: June 6, 2013

EXHIBIT A

COMMONWEALTH OF PENNSYLVANIA

LEGISLATIVE JOURNAL

TUESDAY, MARCH 13, 2012

SESSION OF 2012 196TH OF THE GENERAL ASSEMBLY No. 15

HOUSE OF REPRESENTATIVES

The House convened at 11 a.m., e.d.t.

THE SPEAKER (SAMUEL H. SMITH) PRESIDING

PRAYER

The SPEAKER. This morning the prayer will be offered by the Reverend Dr. Kenneth Bell. He is the Administrative Bishop, Pennsylvania Church of God.

REV. DR. KENNETH R. BELL, Guest Chaplain of the House of Representatives, offered the following prayer:

Thank you, Mr. Speaker.

Almighty God, creator and ruler of the universe and our Heavenly Father, we pause this morning to acknowledge Your sovereignty over our world, Your lordship over our lives, and our need of Your guidance and direction. We are grateful for Your bountiful blessings on our country, on our State, and upon each one of us, and we acknowledge that every good and every perfect gift comes from You.

Father, I ask that You would grant special grace and wisdom to these men and women who represent the millions of Pennsylvanians across this State as they deliberate the critical social, economic, and political issues of our time. May their discussion and deliberations reflect integrity, understanding of the key issues, and the submission of their personal agendas to the greatest good for the citizens of this State.

Father, I ask for a special blessing on America in general and upon Pennsylvania in particular. Bless these men and women, and may they reflect in their actions and behavior the spiritual affirmation of our forefathers that it is "In God We Trust."

And although I fully support and believe in the right of every American to worship whom they please and the way they please, as a Christian who is not ashamed of the Gospel of Jesus Christ, I ask these things in His name. Amen.

PLEDGE OF ALLEGIANCE

(The Pledge of Allegiance was recited by members and visitors.)

JOURNAL APPROVAL POSTPONED

The SPEAKER. Without objection, the approval of the Journal of Monday, March 12, 2012, will be postponed until printed.

SENATE MESSAGE

RECESS RESOLUTION
FOR CONCURRENCE

The clerk of the Senate, being introduced, presented the following extract from the Journal of the Senate, which was read as follows:

In the Senate,
March 12, 2012

RESOLVED, (the House of Representatives concurring), Pursuant to Article II, Section 14 of the Pennsylvania Constitution, that when the Senate recesses this week, it reconvene on Monday March 26, 2012, unless sooner recalled by the President Pro Tempore of the Senate; and be it further

RESOLVED, Pursuant to Article II, Section 14 of the Pennsylvania Constitution, that when the House of Representatives recesses this week, it reconvene on Monday, March 26, 2012, unless sooner recalled by the Speaker of the House of Representatives.

Ordered, That the clerk present the same to the House of Representatives for its concurrence.

On the question,
Will the House concur in the resolution of the Senate?
Resolution was concurred in.
Ordered, That the clerk inform the Senate accordingly.

BILLS REPORTED FROM COMMITTEE, CONSIDERED FIRST TIME, AND TABLED

HB 384, PN 3201 (Amended) By Rep. METCALFE

An Act providing for presentation checks delivered by government officials of the Commonwealth.

STATE GOVERNMENT.

29-page bill that is actually going to make it a little tougher for a lot of people, people that do not drag their identification with them, and then they are going to have to go through this process of putting a provisional ballot in place and then doing all the things that they have to do to prove that, yes, I am a registered voter; here is my ID.

And it is really going to put a lot of strain on the people that work the polls. And as many people have said before, it is really tough to find people to work polls, especially in small communities like I represent. It is only going to make it harder. It is going to make it harder on some of the senior citizens. I just cannot see the rush to justice to do this. It really is going down that road that one of these days maybe we will have to stick our finger in a bottle of blue ink just to make sure that we do not come back and vote twice.

But I just really do not see any need for this legislation. I cannot support it, and I would ask people not to concur in amendments to HB 934. Thank you.

The SPEAKER pro tempore. On the question, the Chair recognizes the gentleman from Allegheny County, Representative Wheatley.

Mr. WHEATLEY. Thank you, Mr. Speaker. May I interrogate the maker of the bill?

The SPEAKER pro tempore. The gentleman indicates he will stand for interrogation. You may proceed.

Mr. WHEATLEY. Thank you, Mr. Speaker.

Mr. Speaker, can you tell me if we have analysis or has there been analysis done on the rate of voter fraud that has occurred in the Commonwealth?

Mr. METCALFE. I am not aware of any study that has done analysis on the rate of voter fraud; no.

Mr. WHEATLEY. Do we know, Mr. Speaker, or has there been any research done, analysis done, to identify where the massive occurrence of fraudulent voting activity has occurred thus far in the Commonwealth?

Mr. METCALFE. Mr. Speaker, there have been incidents of voter fraud in Pennsylvania in the past. In fact, we had an election, the *Marks* v. *Stinson* election in the 1993 special election in the 2d Senatorial District, where they received testimony from political party officials, people working on behalf of the senatorial candidates who described campaign activities that were at best questionable and at worst illegal. Ultimately, the election was overturned. We also had the 1998 conviction of former Pennsylvanian Congressman Austin Murphy, who was convicted of absentee ballot fraud. So we have instances. We have a history in Pennsylvania of voter fraud, of these types of violations of the Election Code, and the violations of the law, elections being overturned, prosecutions occurring. And, Mr. Speaker, as a veteran, as I know you are also, I believe every single individual has a right to have their vote counted, and if any individual vote is being canceled out by a fraudulently cast vote, that is one too many, Mr. Speaker.

Mr. WHEATLEY. Sure. Thank you, Mr. Speaker. I appreciate that.

It is my understanding, Mr. Speaker, that those cases, and I could not hear all the ones you were citing, but the ones I did hear, that those are all referring to fraud via absentee ballot and not necessarily what we are attempting to correct in this particular bill, but I do appreciate you responding to that question, Mr. Speaker.

I just have a few other questions around the analysis, because I have sat and listened to a lot of the comments today, and I am curious to know if we either have already or will have, as a part of this law being implemented, some analysis or studies being done to see if there is a negative or positive impact to our voting process here in the Commonwealth. Meaning, are we planning – since your original statement to the first question was we have not done an analysis yet – are we planning an analysis to figure out how this law will help address whatever fraud is occurring in our voting process?

Mr. METCALFE. Mr. Speaker, there was a long question there. What is the short, summarized version of the question?

Mr. WHEATLEY. The short summary is, are we planning to have an analysis done of the fraud that is happening? If there is fraud happening in our system, are we planning to have an analysis done to find out exactly where the fraud is?

Mr. METCALFE. Mr. Speaker, there have been, as I have worked with staff and as research has been done, there are incidents of fraud that occur around the State. Many times local district attorneys do not prosecute those cases. Years ago I actually worked within this General Assembly to advance a law that would give our Attorney General concurrent jurisdiction on Election Code violation-type cases so that the Attorney General could pick up those cases and pursue those. What we have seen over the years is those prosecutions just do not occur very regularly. They are not something that is pursued normally by the D.A.s, by the Attorneys General, but we do have a case. And what you mentioned earlier is your question being related to absentee voter fraud; this legislation as amended by the Senate addresses absentee voter fraud. Some of the amendments that were put in were, this new, this amended version of 934 will address absentee voter fraud situations by requiring identification when somebody is asking for that by requiring a driver's license, last four of Social Security number. But we did have an incident, which you were asking about any incidents that we have had in Pennsylvania as you are looking to analyze it, but we had an incident where there were two names registered in Philadelphia as Cheeseborough, spelled different ways; both born on the same date, both voted in the 2007 primary and the 2007 general, 2008 primary elections. The phone numbers that they had given on the voter registration forms were wrong, disconnected; gave addresses where it was impossible to live. I think one was a vacant lot and one was a 7-Eleven, I believe. These individuals being found to not actually be anybody that could be validated, they have been, as I understand, removed from the polls now because they did not really exist. So we have incidents like that that do occur; not something that is being prosecuted, but something that really raises the alarm signal for any law-abiding citizen across the State that wants to make sure their vote is counted, that we do not want to see any fraudulent votes cast. That is why it is important to make sure when somebody shows up to vote, they actually prove they are who they claim to be.

Mr. WHEATLEY. And certainly, Mr. Speaker, as you stated earlier, I definitely am very concerned and committed to make sure every vote, every Pennsylvanian that is eligible and qualified to vote has the opportunity to vote. From your explanation, can you help me understand how, if we were to implement this law as it is currently drafted, how this would have prevented the case in Philadelphia that you mentioned from happening?

EXHIBIT B

DARYL METCALFE, MEMBER
HOUSE OF REPRESENTATIVES
ROOM 43, EAST WING
PO BOX 202012
HARRISBURG, PENNSYLVANIA 17120-2012
PHONE: (717) 783-1707
FAX: (717) 787-4771

E-mail: dmetcalf@pahousegop.com
Website: RepMetcalfe.com

House of Representatives
Commonwealth of Pennsylvania
Harrisburg

CRANBERRY TOWNSHIP MUNICIPAL BUILDING
2525 ROCHESTER ROAD, SUITE 201
CRANBERRY TOWNSHIP, PA 16066
PHONE: (724) 772-3110
FAX: (724) 772-2922

STATE GOVERNMENT COMMITTEE
CHAIRMAN

March 20, 2012

The Honorable Robert Brady
102 Cannon HOB
Washington, DC 20515

Dear Congressman Brady,

Thank you for contacting me and voicing your concerns regarding House Bill 934, the Pennsylvania Voter Identification Protection Act. However, I must admit that I was greatly taken aback by your rhetoric, which is very similar to the Democrat opposition talking points.

Voter fraud has been a documented problem throughout the history of Pennsylvania. The previous lack of proper checks and balances in our election system made it difficult to fully grasp the magnitude of the problem. I believe that the General Assembly is required by the Constitution to ensure that every vote cast by a legally registered voter is protected and we should not treat the casting of any one fraudulent vote as inconsequential. For example, the 1918 election in the 10th Congressional district was overturned by Congress. In 1998, former U.S. Congressman Austin Murphy was convicted for absentee ballot fraud. However, it does not end there. Right in your backyard, an ACORN employee from Chester, Delaware County was arrested in 2008 and later convicted for forging and submitting fraudulent voter registration applications.

Defenders of the status quo are merely defending the corruption and fraud occurring in our election system. The right to vote is one of the most fundamental rights of American citizenship. American patriots have and continue to put their lives on the line to protect our freedoms, including the freedom to privately and confidentially cast a vote at the ballot box.

Additionally, our most recent fiscal note also indicated that the cost to successfully implement House Bill 934 would be approximately $1 million. Governor Tom Corbett has already allocated funding for this measure in his 2012-13 budget proposal. However, there is a cost associated with implementing good government measures. I understand your concern regarding the appropriate use of limited tax dollars, as I am one of the most fiscally conservative votes in the General Assembly.

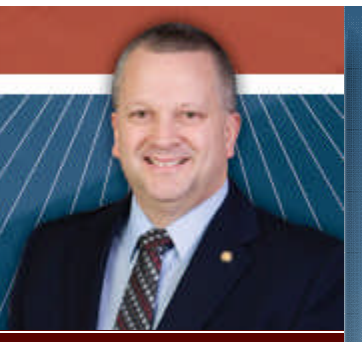
You may also be pleased to know that the General Assembly successfully passed a budget for the current fiscal year that balances the Commonwealth's expenditures with general fund revenue. It is my understanding that Congress has not passed a balanced budget in over 1,000 days and the federal government is facing a sizeable deficit. I hope you will consider the limitations of tax dollars on the federal level, as Congress debates the federal fiscal matters as well.

House Bill 934 is a basic commonsense requirement to ensure integrity and accountability in our state election system.

For Liberty,

Daryl D. Metcalfe
State Representative

EXHIBIT C



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05/22/2013

Metcalfe Reminds Local Residents About 2013 Senior Expo
05/22/2013

Metcalfe Introduces Constitutional Amendment to Settle Marriage Protection Debate for Pennsylvania
05/07/2013

Show All Items

Metcalfe Tells Congressman Brady to Stop Endorsing Voter Fraud and Corruption

3/27/2012
HARRISBURG —The following excerpts are taken from a letter sent by House Republican Majority State Government Committee Chairman State Representative Daryl Metcalfe (R-Butler) in response to a letter sent by U.S. Congressman Robert Brady (D-Philadelphia) opposing the Pennsylvania Voter Identification Protection Act (Act 18 of 2012), which was recently signed into law by Gov. Tom Corbett.

"Voter fraud has been a documented problem throughout the history of Pennsylvania. The previous lack of proper checks and balances in our election system made it difficult to fully grasp the magnitude of the problem. I believe that the General Assembly is required by the Constitution to ensure that every vote cast by a legally registered voter is protected and we should not treat the casting of any one fraudulent vote as inconsequential...Right in your backyard, an ACORN employee from Chester, Delaware County was arrested in 2008 and later convicted for forging and submitting fraudulent voter registration applications.

"Defenders of the status quo are merely defending the corruption and fraud occurring in our election system. The right to vote is one of the most fundamental rights of American citizenship. American patriots have and continue to put their lives on the line to protect our freedoms, including the freedom to privately and confidentially cast a vote at the ballot box.

"Additionally, our most recent fiscal note also indicated that the cost to successfully implement House Bill 934 would be approximately $1 million. Governor Tom Corbett has already allocated funding for this measure in his 2012-13 budget proposal. However, there is a cost associated with implementing good government measures. I understand your concern regarding the appropriate use of limited tax dollars, as I am one of the most fiscally conservative votes in the General Assembly.

"You may also be pleased to know that the General Assembly successfully passed a budget for the current fiscal year that balances the Commonwealth's expenditures with general fund revenue. It is my understanding that Congress has not passed a balanced budget in over 1,000 days and the federal government is facing a sizeable deficit. I hope you will consider the limitations of tax dollars on the federal level, as Congress debates the federal fiscal matters as well.

"House Bill 934 is a basic commonsense requirement to ensure integrity and accountability in our state election system."

To view the complete letter, click here.

State Representative Daryl Metcalfe
12th District, Pennsylvania House of Representatives
Contact: Ty McCauslin
tmccausl@pahousegop.com
717.772.9979

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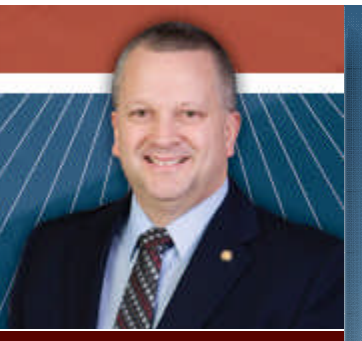
EXHIBIT D



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Metcalfe Refutes Senator's Nullification Nonsense
05/22/2013

Metcalfe Reminds Local Residents About 2013 Senior Expo
05/22/2013

Metcalfe Introduces Constitutional Amendment to Settle Marriage Protection Debate for Pennsylvania
05/07/2013

Show All Items

Voter Photo ID Sponsor Metcalfe Confirms Philadelphia Corruption Findings Will Trigger Future Action Against Election Fraud

7/18/2012
HARRISBURG — Immediately following the release of City Commissioner Al Schmidt's report that identified hundreds of voting irregularities during the recent 2012 primary election in Philadelphia, House State Government Committee Majority Chairman, State Representative Daryl Metcalfe (R-Butler), announced that there will be future hearings to consider additional solutions to combat election fraud throughout Pennsylvania.

"Commissioner Schmidt's report finally confirms what leading Democrat opponents of voter photo ID and those in the mainstream media have been denying all along," said Metcalfe. "Philadelphia is without question one of our nation's most infested epicenters for rampant election fraud and corruption."

Originally drafted to model Indiana's photo identification law, which was upheld as Constitutional by the U.S. Supreme Court in 2008, Metcalfe's Pennsylvania Voter Identification Protection Act (Act 18 of 2012) was signed into law by the governor on March 14. Act 18 requires voters to present valid photo ID before voting to ensure that each legally cast vote is protected from the forces of corruption. It also requires those using absentee ballots to submit proof of identification.

"Commissioner Schmidt's findings add to the ever-growing collection of indisputable evidence proving that requiring the display of valid voter photo ID at the ballot box is essential to deterring election fraud," said Metcalfe. "Most importantly, these findings demonstrate that we must develop additional solutions that go beyond voter photo ID to stamp out corrupting influences."

Expert testimony presented to the House State Government Committee confirmed that requiring valid photo ID at the polls, as made possible through Act 18, can prevent the four most widely documented types of voter fraud, including: impersonation at the polls, fictitious registrations, double-voting and voting by illegal aliens.

Visit www.RepMetcalfe.com or www.Facebook.com/RepMetcalfe for the latest legislative updates.

State Representative Daryl Metcalfe
12th District, Pennsylvania House of Representatives
Contact: Ty McCauslin
tmccausl@pahousegop.com
717.772.9979

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EXHIBIT E

EXHIBIT F

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TRIBLIVE

Pennsylvania voter ID mastermind says law too relaxed

By Brad Bumsted
PITTSBURGH TRIBUNE-REVIEW

Published: Thursday, September 27, 2012, 12:01 a.m.
Updated: Thursday, September 27, 2012

HARRISBURG — The chief architect of the voter ID law said he's disappointed in the way that the Corbett administration is implementing the statute, suggesting it is on its way to being watered down as it moves through the courts.

Lowering the requirements for obtaining a newly made, state-issued photo ID allows the potential for fraud — the very thing the law aims to prevent, said House State Government Chairman Daryl Metcalfe, R-Cranberry.

“We respectfully disagree with Representative Metcalfe,” said Corbett spokesman Kevin Harley. “Our interpretation of the law is the state does have the authority to issue (new) voter ID. We're trying to implement the law in a fair and effective manner, and to provide a photo ID to voters who don't have one.”

A Commonwealth Court judge who upheld the law in August might rule as early as Thursday on whether he will allow its use in the Nov. 6 election.

The state Supreme Court last week sent the case back to Judge Robert Simpson to issue an injunction unless he's convinced the state has made every effort to make sure voters are not disenfranchised.

“I think the executive branch has gone farther than what the law allows them to do,” Metcalfe, the law's prime sponsor, told the Tribune-Review.

There's nothing in the law that allows for alternate state-issued ID from the Department of State, or the relaxed standards the department issued this week, Metcalfe said.

Ron Ruman, a spokesman for the Department of State, said the law allows for photo ID issued by the “federal government or the commonwealth.”

About Brad Bumsted

Pittsburgh Tribune-Review State Capitol Reporter Brad Bumsted can be reached via e-mail or at 717-787-1405

The intent of the law was for voters to primarily use drivers' licenses and secure nondriver ID issued by PennDOT, which require a higher standard of documentation, Metcalfe said. The law also allows voters to use military, university, nursing home and municipal government-issued photo IDs.

Voter ID brought a raging partisan and legal battle. The GOP-controlled Legislature approved it, and Corbett, a Republican, signed it in March. Democrats opposing the law say it's intended to suppress Democratic votes in urban areas among low-income voters and minorities. They say there's no proof of voter impersonation in Pennsylvania.

In a hearing before Simpson on Tuesday, the state announced new standards making it easier for voters to get the Department of State ID, which was first offered in late August. Alfred Putnam, the state's lead lawyer, said the state was trying to meet the Supreme Court's interpretation of the law. He said it would be central to the state's argument against the need for an injunction to halt the law.

A coalition of civil liberties' groups and the NAACP are seeking the injunction. Simpson said he might issue an injunction of some sort. He must rule by Tuesday.

A nondriver's ID from PennDOT is free. It requires a Social Security card, a birth certificate with a raised seal, and two documents proving residence. Applicants also can use a passport or certificate of citizenship, said Jan McKnight, a PennDOT spokeswoman.

The Department of State required two documents proving residence but eliminated that requirement this week. A registered voter can get the Department of State card without any documents by providing name, address, date of birth and a Social Security number, McKnight said. Those are cross-checked in databases, officials said.

“The voter ID law has been a moving target with frequent changes in procedures and now a brand new type of ID,” said Sharon Ward, director of the Pennsylvania Budget and Policy Center.

The policy center in a joint project with the Service Employees International Union visited 44 licensing centers and concluded voters are receiving little information about the new form of identification and in some cases were discouraged from seeking a Department of State ID.

“The commonwealth is still falling short when it comes to ensuring that voters have access to free ID,” Ward said.

PennDOT customer service representatives initially encouraged people to get the more secure form of ID, McKnight said. She noted the survey was done in September only shortly after the Department of State cards were created. Workers now offer the Department of State cards first, McKnight said.

A study by a Swarthmore College professor for Senate Democrats released on Wednesday found 4 percent of voters did not have photo ID. Keith Reeves, director of the Center for Social and Policy studies, conducted a survey of 277 voters at Philadelphia precincts in the April primary when photo ID was optional.

Brad Bumsted is state Capitol reporter for Trib Total Media. He can be reached at 717-787-1405 or bbumsted@tribweb.com.

EXHIBIT G

Peterson, Dana

From: Daryl Metcalfe [Dmetcalf@pahousegop.com]
Sent: Wednesday, March 06, 2013 12:26 PM
To: Steve Barrar; Marks, Jonathan; Susan Boyle
Subject: RE: Important Information re: DOS ID for Voting Purposes

Appropriate question and the answer is political correctness is valued more than common sense by whoever approved this form.

The greater question is why is this being pursued when no statutory authority exists for the id card?

Serving the 12th District,
Daryl Metcalfe
State Representative

From: Steve Barrar [mailto:parep160@aol.com]
Sent: Wednesday, March 06, 2013 11:31 AM
To: Marks, Jonathan; Daryl Metcalfe; Susan Boyle
Subject: Re: Important Information re: DOS ID for Voting Purposes

Hello Jonathan
I am just curious as why there is a Spanish version attached to with this email as an example of the form available. I thought being a US citizen required a person to have the ability to read and write English.
I have a huge population of Asian Americans in my district that speak at least 10 to 15 different languages... Will they be able to get these forms in their language?

Stephen Barrar
Pa House of Reps.
160th Legislative District.

On Mar 6, 2013, at 10:38 AM, "Marks, Jonathan" <jmarks@pa.gov> wrote:

> All Members of the Pennsylvania General Assembly,
>
> We at the Department of State recognize and appreciate that one of your core duties as elected officials is to provide information and assistance to the constituents you represent. In light of this fact, it is often necessary for the Department to provide you with up-to-date information regarding its programs and/or services.
>
> As you know, the Department has been working with PennDOT since last summer to issue a "Department of State ID for Voting Purposes" (DOS ID) to those registered voters who are unable to obtain a traditional PennDOT Driver's License or a free Non-Driver photo ID. To ensure that you are providing to your constituents the most up-to-date information about the DOS ID, I am attaching to this email a copy of the recently updated DOS ID Application/Affirmation.
>
> I hope this information is helpful. If you have any questions regarding my email or the attachment, please feel free to contact me directly at 717-787-9201.
>
> Sincerely,

Jonathan M. Marks | Commissioner
Department of State
Bureau of Commissions, Elections and Legislation
210 North Office Building | Harrisburg, PA 17120
Phone: 717.787.5280 | Fax: 717.705.0721
Email: jmarks@pa.gov

<Affirmation Elector No Proof of ID Rev 02 14 13.pdf>

<Affirmation No Proof of ID ES.PDF>

EXHIBIT H

Peterson, Dana

From: Steve Barrar [parep160@aol.com]
Sent: Wednesday, March 06, 2013 12:45 PM
To: Daryl Metcalfe
Cc: Marks, Jonathan; Susan Boyle
Subject: Re: Important Information re: DOS ID for Voting Purposes

Maybe you need to call the Sec. Of State to a meeting with your committee. I think this is a bad idea, or at least require it to be notarized.

Stephen Barrar
Pa House of Reps.
160th Legislative District.

On Mar 6, 2013, at 12:25 PM, Daryl Metcalfe <Dmetcalf@pahousegop.com> wrote:

> Appropriate question and the answer is political correctness is valued more than common sense by whoever approved this form.
>
> The greater question is why is this being pursued when no statutory authority exists for the id card?
>
> Serving the 12th District,
> Daryl Metcalfe
> State Representative

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Pa House of Reps.
160th Legislative District.

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I hope this information is helpful. If you have any questions regarding my email or the attachment, please feel free to contact me directly at 717-787-9201.

Sincerely,

Jonathan M. Marks | Commissioner
Department of State
Bureau of Commissions, Elections and Legislation
210 North Office Building | Harrisburg, PA 17120
Phone: 717.787.5280 | Fax: 717.705.0721
Email: jmarks@pa.gov

<image001.png>

<Affirmation Elector No Proof of ID Rev 02 14 13.pdf>

<Affirmation No Proof of ID ES.PDF>

EXHIBIT I

DARYL METCALFE, MEMBER
HOUSE OF REPRESENTATIVES
ROOM 43, EAST WING
PO BOX 202012
HARRISBURG, PENNSYLVANIA 17120-2012
PHONE: (717) 783-1707
FAX: (717) 787-4771

E-mail: dmetcalf@pahousegop.com
Website: RepMetcalfe.com

House of Representatives
Commonwealth of Pennsylvania
Harrisburg

CRANBERRY TOWNSHIP MUNICIPAL BUILDING
2525 ROCHESTER ROAD, SUITE 201
CRANBERRY TOWNSHIP, PA 16066
PHONE: (724) 772-3110
FAX: (724) 772-2922

STATE GOVERNMENT COMMITTEE
CHAIRMAN

October 26, 2012

The Honorable Carol Aichele
Pennsylvania Department of State
302 North Office Building
Harrisburg, PA 17120

Dear Secretary Aichele:

As Election Day is fast approaching, I am writing today to seek your immediate feedback regarding an important matter. I am concerned that voters may not be aware that the pre-Act 18 first-time voter proof of identification requirements are in effect for the November 6 election.

While the Department of State's television advertising campaign describes the photo ID requirement for those who have voted at their current election district previously, it may not sufficiently clarify that those voting in a particular election district for the first time must present ID. I realize that county and local election officials are likely to be fully aware of this requirement, but many voters may not be. If this is the case, local election officers may encounter angry voters who are unprepared. Unprepared and confused first-time voters may choose to leave without voting.

I realize that the *General Voter ID FAQ* and the *Voter ID Powerpoint* on the *votesPA* website include information confirming that the preexisting first-time voter identification requirements are still in effect for the November 2012 General Election. I am writing to ask whether you intend to make this information more prominent on your website and/or to dedicate any of your remaining advertising or outreach to ensure that the voting public is aware of the longstanding first-time voter proof of ID requirement. Please consider doing so, as such action would be consistent with your ongoing effort to implement Act 18 and ensure that all legal and eligible voters may cast a ballot.

Thank you for your prompt attention to this matter.

Sincerely,

Daryl D. Metcalfe, Chairman
House State Government Committee

DDM/cmw

EXHIBIT J

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF STATE

November 1, 2012

The Honorable Daryl D. Metcalfe
Pennsylvania House of Representatives
P.O. Box 202012
Harrisburg, Pennsylvania 17120-2012

Dear Representative Metcalfe:

Thank you for your letter about the Department of State's voter ID educational campaign. I share your desire for voters to have accurate information about voting requirements before casting their ballots.

Regarding notice given to first-time voters who are required to show ID at the polls, please know that county Boards of Elections include such notice when they send voter registration cards to voters. These voter cards and accompanying information are sent to newly registered voters and voters who changed their address and may therefore be required to vote in a different polling location if moving outside of their original precinct. The notice from the county is a good way to alert first-time voters about identification requirements affecting them.

In addition, your letter correctly states that our VotesPA website highlights the first-time voter requirements in an FAQ. Please know that we also have a page on the site dedicated to first-time voters. This can be found at the top of the home page in the "I AM..." section by clicking on the "First-Time Voter" link in the drop-down box. The "First-Time Voter" link is frequently used by individuals visiting our site for information. The Department is also planning on reminding the public about first-time voter requirements in our pre-Election Day press release.

As for incorporating first-time voter requirements into our voter ID mass advertising campaign, the Department thought adding this information to such items as thirty-second television and radio commercials might confuse the general voting population. The intent of our advertising campaign is to make sure the general voting population knows voters will be asked but not required to show an acceptable photo ID on November 6 and to familiarize Pennsylvanians with the new law for when it is fully implemented in the future.

Please feel free to contact me should you have additional thoughts or questions about our voter ID educational campaign or any other issue relating to the Department of State.

Sincerely,

Carol Aichele
Secretary of the Commonwealth

Secretary of the Commonwealth
Room 302 North Office Building | 401 North Street | Harrisburg, PA 17120-0500 | 717.787.6458 | Fax 717.787.1734 | www.dos.state.pa.us

Applewhite, et al. v. Commonwealth of Pennsylvania, et al.
No. 330 MD 2012

EXHIBIT 8

Petitioners' Pre-Trial Statement And Application For Special Relief In The Nature Of A Preliminary Injunction

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

Viviette Applewhite; Wilola Shinholster Lee; Gloria Cuttino; Nadine Marsh; Bea Bookler; Joyce Block; 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

STIPULATION

1. The parties hereto stipulate that the documents attached labeled as Exhibits A through H are authentic copies of the materials described in this paragraph.

   A. Exhibit A is a two-page copy of an opinion in *The Philadelphia Inquirer* for Monday, October 10, 2011, written by Secretary of the Commonwealth Aichele.

   B. Exhibit B is a two-page copy of a press release issued by the Office of the Governor and dated March 14, 2012, that includes statements made by Governor Corbett and Secretary of the Commonwealth Aichele.

   C. Exhibit C is a two-page copy of a press release issued by the Department of State and dated April 24, 2012, that includes a quotation of a statement made by the Secretary of the Commonwealth Aichele.

   D. Exhibit D is a three-page copy of an article published in Philly.com posted on July 20, 2012, that includes a sentence quoting Secretary of the Commonwealth Aichele. Secretary Aichele stipulates that the quotation is accurate.

   E. Exhibit E is a one-page copy of a press release issued by the Office of the Governor and dated August 15, 2012, that includes statements made by Secretary of the Commonwealth Aichele.

F. Exhibit F is a two-page copy of an article appearing in *PR Newswire* dated August 23, 2011, that is an accurate reproduction of a press release issued by the Department of State and that includes statements made by Secretary of the Commonwealth Aichele.

G. Exhibit G is a one-page copy of a press release issued by the Office of the Governor dated October 2, 2012, that includes statements made by Governor Corbett and Secretary of the Commonwealth Aichele.

H. Exhibit H is a one-page copy of a formal press statement issued by Rep. Turzai published on October 2, 2012.

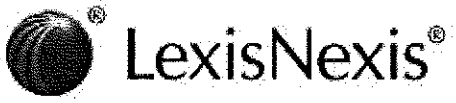
2. The parties stipulate that Governor Corbett and Representative Turzai will not testify by deposition or at trial in this manner. Further, Respondents represent that they will not call Secretary of the Commonwealth Aichele to testify further by deposition or at trial.

3. It is expressly understood that in signing this stipulation, the parties do not waive any objections to the admissibility of the exhibits or the consents thereof, except that the parties waive any objection to the authenticity of the exhibits.

By: Timothy P. Keating Thomas P. Keating Senior Deputy Attorney General Civil Litigation Section 15th Floor, Strawberry Square Harrisburg, PA 17120 Attorney for Respondents	By: Michael Rubin Arnold & Porter LLP 555 Twelfth Street, NW Washington, DC 20004-1206 Witold J. Walczak ACLU of Pennsylvania 313 Atwood Street Pittsburgh, PA 15213 Jennifer R. Clarke Public Interest Law Center of Philadelphia 1709 Benjamin Franklin Parkway, 2nd Floor Philadelphia, PA 19103 Marian K. Schneider Advancement Project 295 E. Swedesford Road #348 Wayne, PA 19087 Attorney for Petitioners

Date: June 12, 2013

EXHIBIT A



The Philadelphia Inquirer

October 10, 2011 Monday
CITY-C Edition

SECTION: EDITORIAL; P-com Nav Inquirer Opinion; Pg. A22

LENGTH: 456 words

HEADLINE: Inquirer Editorial: Need more protections against voter fraud

BODY:

By Carol Aichele

Voting is among our most basic and precious rights. We fought a revolution for it, and for more than two centuries, Americans have died protecting this cornerstone of our representative democracy.

African Americans gained this right only after a civil war. Full enfranchisement took another century and the Voting Rights Act. Women struggled long and hard until they won suffrage in 1920.

We must safeguard this right for those who are legally entitled to vote, and uphold the longstanding principle of one person, one vote. This is why the Corbett administration supports requiring voters to show photo identification before casting a ballot: to deter fraud and make sure every person's vote has the weight it deserves in deciding elections.

Today, photo IDs are required to board an airplane, cash a check, or buy allergy medicine over the counter. Voting is more important than these activities. Voters understand this. A recent Rasmussen poll found 75 percent of likely U.S. voters back requiring photo IDs at the polls.

Refuting opponents' arguments, the Universities of Delaware and Nebraska found voter ID laws had no effect on turnout in federal elections from 2000 to 2006, including across racial, ethnic, and socio-economic lines.

After Georgia's law, among the nation's strictest, took effect in 2008, there was a record turnout in the presidential primary. In the 2008 general election, Georgia had its largest turnout ever. The African American vote increased 5 percent.

A Pennsylvania Department of State analysis shows 99 percent of eligible voters currently have acceptable photo IDs, and proposals under discussion will likely expand the list of photo IDs that can be used. PennDot will supply a free ID for those who need one, so the greatest possible cost to taxpayers is slightly more than $1 million, a small price to ensure the validity of each vote.

Some argue this is a solution without a problem, but in 2009, an FBI investigation led to forgery and election-fraud charges against seven Pittsburgh-area ACORN workers; in 2008, a Philadelphia official submitted more than 8,000 fraudulent ACORN-collected voter-registration forms.

The Corbett administration also supports ID measures for absentee ballots. We need only look back to a 1994 state Senate election in Philadelphia, when absentee-voter fraud was so massive that a federal judge actually overturned the results and awarded the seat to the losing candidate.

Sadly, voter fraud has occurred in Pennsylvania. We should not wait for it to happen again. Voter ID will assuredly help detect and deter this fraud, safeguarding our state's election process.

Contact Pennsylvania Secretary of the Commonwealth Carol Aichele at RA-VoterID@pa.gov.

LOAD-DATE: October 10, 2011

EXHIBIT B

News for Immediate Release

March 14, 2012

Governor Corbett Signs Voter ID Bill to Require Photo Identification

Harrisburg – Governor Tom Corbett today signed into law House Bill 934, also known as the Photo Voter ID bill, which will require Pennsylvanians to produce photo identification when they vote.

"I am signing this bill because it protects a sacred principle, one shared by every citizen of this nation. That principle is: one person, one vote,'' Corbett said. "It sets a simple and clear standard to protect the integrity of our elections.''

The law goes into effect immediately, but the photo ID will not be required for the primary election next month. However, voters will be reminded at that time that a photo ID will be required for November's general election.

Studies show that 99 percent of Pennsylvania's eligible voters already have acceptable photo IDs. Any voter who does not have an acceptable form of photo ID can get one, free of charge, at any PennDOT driver license center.

A recent poll determined that 87 percent of Pennsylvania voters favor a law requiring identification at the polls. Thirty-one other states currently require identification and 15 of them require a photo ID.

Some examples of a photo ID include a Pennsylvania driver's license or non-driver license photo ID, a military ID, valid U.S. passport, county or municipal employee ID, college ID or personal care home ID. All photo IDs must be current and include an expiration date.

This law is designed to make sure all citizens legally entitled to vote can do so. Individuals applying to register to vote must be:

- A citizen of the United States for at least one month before an election;
- A resident of Pennsylvania and the election district in which the individual desires to register and vote for at least 30 days before the election; and
- At least 18 years of age on or before the election.

Election laws fall under the jurisdiction of the Department of State.

"This law will help us preserve the integrity of every vote in Pennsylvania,'' said Secretary of the Commonwealth Carol Aichele. "No one entitled to vote will be

denied that right by this bill, but by preventing those not legally allowed to vote from casting ballots, we will make sure every vote carries the weight it should in deciding elections.''

For more information on the voter ID law or voter registration, call the Department of State's toll-free hotline at 1-877-VOTESPA (1-877-868-3772) or visit www.VotesPA.com.

Media contacts:
Janet Kelley, Governor's Office, 717-783-1116
Ron Ruman, Dept. of State, 717-783-1621

###

EXHIBIT C

News for Immediate Release

April 24, 2012

Secretary of Commonwealth Visits Several Philadelphia Polling Places, Reports Voter ID 'Soft Rollout' Going Well

Harrisburg – Secretary of the Commonwealth Carol Aichele today visited several polling places in Philadelphia to get a first-hand look at how the voter ID "soft rollout" was working.

"From what I observed, most voters came with photo ID and presented it when asked to do so by poll workers," said Aichele, whose department oversees elections. "The process seemed to work well."

While photo ID was requested by poll workers today, it was not required to vote, but will be needed for the November election, under Pennsylvania's new voter ID law.

Governor Tom Corbett signed Pennsylvania's voter ID law into law in March, making Pennsylvania the 16th state to require photo ID when voting.

"Voter ID is a common-sense way to preserve the integrity of every vote, by providing a reliable way to verify the identity of each voter," Aichele said. "This law will help prevent legal votes from being canceled or diluted by illegally cast ballots."

Aichele visited several polling sites in Philadelphia's 66th ward, including Knights Road, Ryan Avenue, Academy and Torrey Roads, Red Lion and Caldera Roads, as well as Frankford Avenue and Hartel Street.

Officials in the Bureau of Commissions, Elections, and Legislation also reportedly heard no concerns from county election directors about the voter ID law.

Starting with the November election, all photo IDs must be current and contain an expiration date, unless otherwise noted. Acceptable IDs include:

- Photo IDs issued by the U.S. federal government or the Commonwealth of Pennsylvania;
- Pennsylvania driver's license or non-driver's license photo ID (IDs are valid for voting purposes 12 months past expiration date);
- Valid U.S. passport;
- U.S. military ID - active duty and retired military (a military or veteran's ID must designate an expiration date or designate that the expiration date is indefinite). Military dependents' ID must contain an expiration date;

- Employee photo ID issued by federal, Pennsylvania state, or a Pennsylvania county or municipal government;
- Photo IDs from an accredited public or private Pennsylvania college or university; or
- Photo IDs issued by a Pennsylvania care facility, including long-term care facilities, assisted living residences or personal care homes.

Information on the voter ID law is available at www.VotesPA.com, or by calling 1-877-VOTESPA. Any voter who does not have an acceptable form of photo ID can get one at any PennDOT driver license center free of charge.

Media contact: Ron Ruman, 717-783-1621

###

EXHIBIT D

Report turns up Philadelphia voting irregularities

City Commissioner Al Schmidt (STEVEN M. FALK / Staff Photographer, file)

By Bob Warner, Inquirer Staff Writer

POSTED: July 20, 2012

A report on Philadelphia voting irregularities issued Wednesday by Republican City Commissioner Al Schmidt was immediately overwhelmed with partisan rhetoric over Pennsylvania's new voter ID law.

Schmidt's staff took a detailed look at election operations in the April 2012 primary, focusing on roughly 15 divisions - less than 1 percent of the city's polling places - where a preliminary analysis suggested there were more votes recorded than the number of people who showed up at the polls.

That turned out not to be the case in most of the divisions Schmidt

We Recommend

Karen Heller: Pennsylvania voter ID law will cut turnout, not fraud
July 22, 2012

Philly election official details examples of voter fraud
July 19, 2012

Latest voter-ID data add confusion

which could make a difference in a tight race decided by a small number of votes, he said at a news conference.

Among the irregularities Schmidt cited:

One woman, whose name was not disclosed, apparently voted twice at two polling places in two West Philadelphia wards. Schmidt said he was referring the case to the district attorney.

Six unexplained votes appeared for Republican candidates in a division in Mayfair's 55th Ward.

Citywide, 23 people who were not registered to vote were allowed to vote anyway, because the election officials at their polling places did not follow the prescribed procedures for dealing with people whose names did not appear in poll books.

Eight people were allowed to vote in the Democratic primary in West Philadelphia's Sixth Ward, even though they were registered in other political parties.

Because some voters were sent to the wrong voting machines, where two or more divisions were voting in the same building, three people cast votes in legislative races in districts where they didn't live.

Vote fraud targeted by new Pa. voter ID law no longer common
May 4, 2012

Inquiries from federal immigration officials led this year to the discovery that 19 registered voters in Philadelphia are not U.S. citizens, and therefore not legally registered. Most of them didn't actually vote, but over the last 10 years, seven of the 19 have voted in at least one election, Schmidt said.

Schmidt's review of the primary election did not disclose any previously unreported instances of voter impersonation, ostensibly the major reason for the state's new voter ID law, which requires all Pennsylvania voters to present a driver's license or other specified form of photo ID when they go to the polls in November.

But he threw in a two-page description of the only known voter impersonation case in Philadelphia in the last five years - the still-mysterious case of someone who has registered twice, originally in 1990 as "Joseph Cheeseboro," using a South Philadelphia address that later became a vacant lot, and again in 2003 as "Joseph J. Cheeseborough," using an address that belonged to a 7-Eleven store.

Cheeseborough didn't vote under either name in the 2012 primary. But he had voted under one name or the other in eight elections over the last five years, and in the 2007 primary and general elections, he voted twice, using both names, Schmidt reported.

Schmidt said his report was designed to describe the kinds of irregularities that occur in Philadelphia elections, not to play a role in the continuing controversy over voter ID, which faces a critical test in Commonwealth Court beginning next week.

But it did just that. Various state Republican leaders jumped on Schmidt's report as evidence of massive corruption in Philadelphia elections, justifying voter ID and maybe more.

"Commissioner Schmidt's report finally confirms what leading Democrat opponents of voter photo ID and those in the mainstream media have been denying all along," said a news release from State Rep. Daryl Metcalfe (R., Butler), who chairs the House State Government Committee.

"Philadelphia is, without question, one of our nation's most infested epicenters for rampant election fraud and corruption," Metcalfe added, promising future hearings "to combat election fraud throughout Pennsylvania."

Secretary of the Commonwealth Carol Aichele seconded the alarm. "It is clear that some of the alleged crimes would have been prevented if Pennsylvania's voter ID law had been in place in previous elections," she said.

State Republican chairman Rob Gleason said Schmidt's report "should silence all those partisans and pundits who have been saying that there are no cases of voter fraud. . . . Voter ID legislation takes a step forward in combating threats to our election process."

Schmidt's colleague in City Hall, City Commission Chairwoman Stephanie Singer, a Democrat, said his report "includes serious allegations of voting irregularities . . . that certainly warrant a more thorough investigation."

But she added she saw "no conclusive evidence that the new voter photo ID law will help mitigate the incidences described."

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Worldview: Syria's Assad shows disdain for U.S. efforts

EXHIBIT E

News for Immediate Release

Aug. 15, 2012

Governor Corbett, Secretary of Commonwealth Respond to Voter ID Ruling

Harrisburg – Governor Tom Corbett today issued the following response to the Commonwealth Court ruling on voter identification:

"Now that the court has upheld the constitutionality of the law, we can continue to focus our attention on ensuring that every Pennsylvania citizen who wants to vote has the identification necessary to make sure their vote counts.''

Secretary of the Commonwealth Carol Aichele, whose department oversees elections in Pennsylvania, also issued a statement:

"I am pleased Judge Simpson affirmed the constitutionality of the voter ID law. This law will reinforce the principle of one person, one vote. By giving us a reliable way to verify the identity of each voter, the voter ID law will enhance confidence in our elections.

"We will continue our outreach efforts to make sure all legal Pennsylvania voters know about the law, and know how to get a free ID to vote if needed."

For more information, visit www.votesPA.com.

Media contacts:
Janet Kelley, Governor's Office; 717-783-1116
Ron Ruman, Dept. of State; 717-783-1621

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EXHIBIT F

Pennsylvania Secretary of Commonwealth: Photo ID Protects Integrity of Every Vote

LANCASTER, Pa., Aug. 23, 2011 /PRNewswire-USNewswire/ -- Requiring Pennsylvania voters to provide photo identification will protect the right of every legal voter to have their vote carry the weight it should, Secretary of the Commonwealth Carol Aichele said today.

Speaking to the 2011 Pennsylvania County Election Officials Conference in Lancaster, Aichele said requiring voters to provide photo identification will make it harder to commit voter fraud in Pennsylvania.

"My duty, and yours, is to protect the integrity of every vote," said Aichele, Pennsylvania's chief election official, explaining the Corbett Administration's support for the photo ID concept. "We must insure every citizen entitled to vote can do so, but also prevent anyone not entitled to this right from diluting legal voters' ballots, by casting illegal votes."

Aichele said voter turnout in states such as Georgia, with strict photo ID laws upheld by the courts, has increased across racial, ethnic and socio-economic lines.

She noted arrests in the past three years of workers for the group known as ACORN on federal election fraud charges in Pittsburgh, and the submission of 8,000 fraudulent ACORN-collected voter registration forms in Philadelphia, as evidence voter fraud is an issue in Pennsylvania.

Aichele also pointed to a 1994 state Senate election in Philadelphia as a reason the Corbett Administration supports additional voter safeguards for absentee ballots.

"A federal judge found absentee-ballot fraud so massive in this election, he actually overturned the results, and awarded the seat to the losing candidate," Aichele said. "Fraud in this case effectively disenfranchised every voter in that district."

A Department of State analysis shows 99 percent of eligible voters already have an acceptable photo ID, and providing free photo IDs to every other eligible voter, should they all request one, would cost just over $1 million.

"Today, you must show a photo ID to cash a check, board a plane, and check into a hotel," Aichele said. "Requiring a photo ID for something as important as voting will not burden anyone, but will protect the rights of legal voters in Pennsylvania."

Media contact: Ron Ruman , 717-783-1621

SOURCE Pennsylvania Department of State

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May 16, 2013, 12:04 ET

Pennsylvania Secretary of Commonwealth Urges Participation in Primary Election; Reminds Voters They Will Be Asked But Not Required to Show Photo ID
May 14, 2013, 09:26 ET

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EXHIBIT G

News for Immediate Release

Oct. 2, 2012

Governor Corbett, Secretary Aichele Issue Statements on Court Ruling

Harrisburg – Governor Tom Corbett and Secretary of State Carol Aichele issued the following statements today in response to Commonwealth Court Judge Robert Simpson's decision on the Voter ID law:

"We are pleased with Judge Simpson's decision to uphold the constitutionality of the voter ID law,'' Corbett said. "While we believe we have made it possible for every registered voter who needs voter identification to obtain one, we'll continue our efforts for the next election and all future elections, to make sure every registered voter has the proper identification in an effort to preserve the integrity of our voting process in Pennsylvania."

Aichele, whose department oversees elections in Pennsylvania, said:

"The streamlined process put in place by the Corbett Administration to help all voters get IDs would have allowed all voters to have acceptable ID by November. However, the judge has concerns about this, and thus the same procedure will be in effect for this election as for the spring primary, in that voters will be requested to show ID, but ID will not be required to vote.

"We will continue our education and outreach efforts, as directed by the judge in his order, to let Pennsylvanians know the voter ID law is still on track to be fully implemented for future elections, and we urge all registered voters to make sure they have acceptable ID.

"This law is designed to preserve the integrity of every vote by doing what we can to make sure each voter is who they claim to be at the polls, and we are confident this law will be fully implemented in future elections.''

For more information, visit www.pa.gov.

Media contacts:
Kevin Harley, Governor's Office, 717-783-1116
Ron Ruman, Dept. of State, 717-783-1621

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EXHIBIT H

Home
Contact
Latest News
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About Mike
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Working For You
PA Debt Reform Info
Wine and Spirit Sales Privatization Information
9/11 Memorial Web Site
PA's Megan's Law Web Site
State Information
Government Links
PA Department of Treasury
Teacher's Resource Guide
Small Games of Chance

Contact My Office

District Address, Phone Numbers

125 Hillvue Lane, First Floor
Pittsburgh, PA 15237
Town of McCandless
Telephone: (412) 369-2230
Fax: (412) 369-2236

Capitol Address, Phone Numbers

110 Main Capitol
PO Box 202028
Harrisburg, PA 17120-2028
Telephone: (717) 772-9943
Fax: (717) 772-2470

E-Mail Address:
Mturzai@pahousegop.com

Voter Identification Law Withstands Lawsuit, Decision Ultimately Ensures Integrity in Pennsylvania Elections

10/2/2012

HARRISBURG - The following is a statement from House Majority Leader Mike Turzai (R-Allegheny County) in response to today's Commonwealth Court decision on the voter identification law.

"Today's decision by the Commonwealth Court upholds Act 18, and voter identification, and that is good.

"Voter Identification is about ensuring the integrity of our elections and preserving the principle of the 'One person, One vote' doctrine.

"When votes are diluted through fraud, the system starts to break down. Voter identification has always been about creating a level playing field where every Pennsylvanian's vote represents an equal opportunity to have a voice in government.

"The fact is, the election integrity provisions that have passed the House have been to preserve the right of every citizen who is entitled to vote to be able to vote, and every citizen who votes should be sure that his or her vote has not been diluted by somebody else's fraud."

State Representative Mike Turzai
28th District, Pennsylvania House of Representatives

Contact: Stephen Miskin
smiskin@pahousegop.com
717.705.1852

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No. 330 MD 2012

EXHIBIT 9

Petitioners' Pre-Trial Statement And Application For Special Relief In The Nature Of A Preliminary Injunction

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

Viviette Applewhite; Wilola Shinholster Lee; Gloria Cuttino; Nadine Marsh; Bea Bookler; Joyce Block; 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 M.D. 2012

STIPULATION

Petitioners and Respondents, by and through their undersigned counsel, hereby stipulate as follows in relation to PennDOT's 2013-14 budget request:

1. What assumptions does the $896,000 figure make about the number of free IDs to be issued?

The $896,000 was not based on a specific assumption of the number of free IDs to be issued in fiscal year 2013-14. In fiscal year 2012-13, PennDOT received an appropriation of $1 million to provide this service. PennDOT spent less than $500,000 of the $1 million appropriated for fiscal year 2012-13, much of which has been for systems costs. Less than $200,000 is attributable to free IDs issued in fiscal year 2012-13. For fiscal year 2013-14, the Governor's Office of Budget provided guidance that the total amount of an agency's General Fund appropriations was not to be more than the total for fiscal year 2012-13. Given that an additional $104,000 will be needed in fiscal year 2013-14 for other appropriations needed by PennDOT from the General Fund, PennDOT requested a comparable reduction for the free ID appropriation. Based on the level of spending in fiscal year 2012-13 under the free ID appropriation, $896,000 for fiscal year 2013-14 should be sufficient to cover any systems costs incurred and free IDs issued.

2. How much of the $896,000 budget request for next year is meant to cover Phase 3?

There was no specific allocation made to cover Phase 3.

3. How much of the $896,000 budget request for next year is meant to cover the issuance of free photo IDs for voting purposes?

There was no specific allocation made to cover the issuance of free photo IDs for voting purposes.

4. How much of the $896,000 budget request for next year is meant to cover extended hours at DLCs?

There was no specific allocation made to cover extended hours at DLCs.

If any, which DLCs and what dates/hours? Not applicable.

Who picked those DLCs/dates/hours and on what basis? Not applicable.

5. Is the $896,000 budget request for next year meant to cover anything else?

The budget request is intended to cover any systems costs, free IDs or other contingencies that may arise.

By: Timothy P. Keating Timothy P. Keating, Esq. Senior Deputy Attorney General Civil Litigation Section 15th Floor, Strawberry Square Harrisburg, PA 17120 Attorney for Respondents	By: Michael Rubin Arnold & Porter LLP 555 Twelfth Street, NW Washington, DC 20004-1206 Witold J. Walczak ACLU of Pennsylvania 313 Atwood Street Pittsburgh, PA 15213 Jennifer R. Clarke Public Interest Law Center of Philadelphia 1709 Benjamin Franklin Parkway, 2nd Floor Philadelphia PA 19103 Marian K. Schneider Advancement Project 295 E. Swedesford Road #348 Wayne, PA 19087 Attorneys for Petitioners

Date: June 14, 2013