

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

<b>TREVA THOMPSON, et al.</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
	)	
<b>v.</b>	)	<b>Civil Action No.</b>
	)	<b>2:16-cv-783-WKW</b>
	)	
<b>STATE OF ALABAMA, et al.,</b>	)	
	)	
<b>Defendants.</b>	)	

**NOTICE OF SUPPLEMENTAL INFORMATION**

The defendants need to give this Court the following supplemental information about the Secretary's plans to implement HB 282 in light of statements made in declarations and by counsel at the preliminary injunction hearing.

First, as noted at the hearing, Brent Beal testified by declaration that the Secretary has always intended to hold a press conference about the new law and that the conference was planned for July 27, 2017. Unfortunately, that press conference did not take place as anticipated. Nonetheless, the Secretary's office is still considering additional ways to promote the law.

Second, as explained at the hearing, the Secretary of State's computer database is not searchable by the year that a voter is removed from the voter rolls, even though aggregate data about how many removals occur is available. A fuller

explanation of the database is included in the attached Second Declaration of Ed Packard.

Respectfully submitted,

Steve Marshall  
*Attorney General*

Andrew L. Brasher (ASB-4325-W73B)  
*Solicitor General*

s/ Mary K. Mangan  
Mary K. Mangan (ASB-1491-E08V)  
*Assistant Solicitor General*

James W. Davis (ASB-4063-I58J)  
Misty S. Fairbanks Messick (ASB-1813-T71F)  
*Assistant Attorneys General*

OFFICE OF THE ATTORNEY GENERAL  
501 Washington Avenue  
Post Office Box 300152  
Montgomery, Alabama 36130-0152  
telephone: 334.242.7381  
facsimile: 334.242.4891  
[abrasher@ago.state.al.us](mailto:abrasher@ago.state.al.us)  
[mmangan@ago.state.al.us](mailto:mmangan@ago.state.al.us)  
[jimdavis@ago.state.al.us](mailto:jimdavis@ago.state.al.us)  
[mmessick@ago.state.al.us](mailto:mmessick@ago.state.al.us)

**CERTIFICATE OF SERVICE**

I hereby certify that, on July 28, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

James U. Blacksher  
Post Office Box 636  
Birmingham, Alabama 35201  
jblacksher@ns.sympatico.ca

J. Mitch McGuire  
McGuire & Associates, LLC  
31 Clayton Street  
Montgomery, AL 36104  
jmcguire@mandabusinesslaw.com

Danielle Lang  
J. Gerald Herbert  
Campaign Legal Center  
1411 K Street NW Suite 1400  
Washington, DC 20005  
dlang@campaignlegalcenter.org  
gherbert@campaignlegalcenter.org

Jessica Ring Amunson  
Jenner & Block LLP  
1099 New York Ave. NW Suite 900  
Washington, DC 20001  
jamunson@jenner.com

Pamela Karlan  
Stanford Law School  
559 Nathan Abbott Way  
Stanford, CA 94305  
karlan@stanford.edu

Aderson B. Francois  
Patrick Llewellyn  
Institute for Public Representation  
Georgetown University Law Center  
600 New Jersey Avenue NW  
Washington, DC 20001  
abf48@georgetown.edu

Armand G. Derfner  
Derfner & Altman  
575 King Street, Suite B  
Charleston, SC 29403  
aderfner@dernaltman.com

s/ Mary K. Mangan  
Of Counsel

# **EXHIBIT A**



4. I understand that the plaintiffs claim that I could cull the list through the same process that I use to prepare NVRA reports about the aggregate number of removals over a two-year period. But our computer system does not work that way. Attached as an exhibit to this declaration are screenshots that show how the NVRA reports are prepared. The first page is the configuration page for the NVRA reports, where I can choose to present the information by county, by date range, etc. The second page is the results page, which provides aggregate information about removals. Because this aggregate information is not linked to any specific voter, I cannot use this system to prepare a list of names and addresses of voters who have been removed from the voter list over the last two years.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on July 26, 2017.

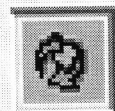
  
\_\_\_\_\_  
Edward Packard



# JVRA Statistics Report

Job Processor

Start at: 07/25/2017 08:37 AM



Date From: 6/1/2017



Date To: 6/30/2017



☐ Group by Source Type

☒ Produce one report combining all selected jurisdictions

☐ Produce one report for each of the selected jurisdictions

Jurisdictions to search

Available

## Jurisdiction

AUTALIGA  
BALDWIN  
BARBOUR  
BIBB

>>

>> All

<<

<< All

Selected

## Jurisdiction



er Title:

Apply

<u>Number of Duplicate Registration Applications</u>	
None	589
<b>Total</b>	<b>589</b>

<u>Number of Denied Registration Applications</u>	
None	1,410
<b>Total</b>	<b>1,410</b>

<u>Number of Registrants Made Inactive</u>	
None	1,613
<b>Total</b>	<b>1,613</b>

<u>Number of Suspended Registration Applications</u>	
None	6,919
<b>Total</b>	<b>6,919</b>

<u>Number of Registrants Deleted</u>	
None	52,989
<b>Total</b>	<b>52,989</b>

<u>Number of All Registration Applications Received</u>	
None	192,984
<b>Total</b>	<b>192,984</b>

<u>Removals by Status Reason</u>	
ACTIVE REGISTRANT	56
ADDRESS INCOMPLETE/NON-STANDARD	1
CONFIRMATION MAILING PROCESS	3
CRIMINAL CONVICTION/MORAL TURPITUDE	793
DEATH NOTICE	9,620
DUPLICATE	1,157
MENTAL INCOMPETENCE	1
MOVE OUTSIDE OF COUNTY/CITY/STATE	4,617