

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

BRIAN VALENTI, on his own behalf and )  
on behalf of a class of those similarly )  
situated, )

Plaintiffs, )

v. )

No. 1:15-cv-1304-WTL-TAB

INDIANA SECRETARY OF STATE, in her )  
official capacity; THE INDIVIDUAL MEMBERS )  
of the INDIANA ELECTION COMMISSION, )  
in their official capacities; THE )  
SUPERINTENDENT of the INDIANA STATE )  
POLICE, in his official capacity; THE )  
BLACKFORD COUNTY PROSECUTOR, in his )  
official capacity, )

Defendants. )

**AFFIDAVIT OF KANDY KENDALL**

**COMES NOW** Kandy Kendall, being first duly sworn upon her oath, and states as follows:

1. I am an adult resident of Marion County, Indiana and a paralegal employed by the American Civil Liberties Union of Indiana.
2. I am familiar with the Indiana Sex and Violent Offender Registry and have visited the website – <http://www.icrimewatch.net/indiana.php> – on numerous occasions.
3. On August 28, 2015, I reviewed a sampling of individuals listed on the Indiana Sex and Violent Offender Registry in Marion and Lake Counties.
4. Specifically, I reviewed the first 50 individuals listed alphabetically in Marion County who were convicted of an Indiana offense and the first 50 individuals listed alphabetically in Lake County who were convicted of an Indiana offense.

5. For each person listed, I observed whether that person was either listed as a sexually violent predator or listed as being convicted of at least one of the offenses listed under Indiana Code § 35-42-4-14(a)(2).
6. If the person was not convicted of an Indiana offense or there was insufficient information to determine the person's conviction, I skipped the entry and did not count that individual among the 50 individuals I reviewed.
7. Of the 50 individuals I reviewed on the registry for Marion County, 45 were either registered as sexually violent predators or registered as having been convicted of an offense listed under Indiana Code § 35-42-4-14(a)(2).
8. Of the 50 individuals I reviewed on the registry for Lake County, 35 were either registered as sexually violent predators or registered with an offense listed under Indiana Code § 35-42-4-14(a)(2).
9. The total number of registrants, as indicated by the Indiana Sex and Violent Offender Registry website, in Marion County was 2,211 and in Lake County was 563.

**VERIFICATION**

I hereby verify, under penalties for perjury, that the foregoing statements are true and correct to the best of my information and belief.

9/1/15  
Date

Kandy Kendall  
Kandy Kendall, Affiant