

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ALTANTA DIVISION

GEORGIA COALITION FOR THE
PEOPLES’ AGENDA, INC., et al.,

Plaintiffs,

vs.

ROBYN A. CRITTENDEN, in her official
capacity as Secretary of State for the
State of Georgia,

Defendant.

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Civil Action No.:
1:18-cv-04727-ER

Comes Now, Defendant Secretary of State Robyn A. Crittenden¹, by and through the Attorney General for the State of Georgia, and files this Answer and Defenses to the allegations of Plaintiffs’ Complaint as follows:

FIRST DEFENSE

Plaintiffs’ Complaint fails, in whole or in part, to state a claim upon which relief may be granted.

¹ Plaintiffs’ original Complaint and First Amended Complaint named former Secretary of State and Governor-Elect Brian Kemp as the party defendant. Pursuant to Fed. R. Civ. P. 25(d), Secretary Crittenden is automatically substituted as the party defendant.

SECOND DEFENSE

Defendant denies that Plaintiffs have been subjected to the deprivation of any right, privilege, or immunities under the Constitution or laws of the United States.

THIRD DEFENSE

Some of Plaintiffs' claims may be barred by the doctrines of collateral estoppels and res judicata.

RESPONSES

Answering the specific allegations of the Complaint, Defendant responds as follows:

1. Defendant admits only that Governor Deal signed HB 268 into law in 2017 but denies all remaining allegations.

2. Defendant admits that the process codified by HB 268 includes compliance with the Help American Vote Act (HAVA), 52 U.S.C. § 21083(a)(5)(B), which requires States to “match information in the database of the statewide voter registration system with information in the database of the motor vehicle authority to the extent required to enable each such official to verify the accuracy of the information provided on applications for voter registration.” Defendant further admits that Georgia’s statewide voter registration system is Enet. Defendant

further admits that when information on the applicant's voter registration application does not match the data on file with DDS or SSA, the application is put in a pending status, allowing the applicant up to 26 months to verify the accuracy of the information they have provided, including by verifying their identity at the polls. Defendant denies that the match with DDS is an "exact match" as described by Plaintiffs.

3. Defendant denies that the HAVA match is an "exact match" as described by Plaintiffs. More specifically, the match on the applicant's first name only requires that the first letter match. Defendant admits that the applicant's last name must match on every letter. The remaining allegations in paragraph 3 are legal conclusions to which no response is required. To the extent that a response is required, Defendant responds that the statute speaks for itself. Additionally, Defendant responds further stating that mandatory training by the Secretary of State's office *does* instruct election officials to check for data entry errors.

4. Defendant admits that if DDS reports that the applicant has identified themselves to DDS as a non-citizen, the voter registration application will be flagged for a check of the applicant's citizenship status. There is no citizenship information provided in the match with SSA. Defendant admits that a few registrars, contrary to training, have placed applicants in pending status for

citizenship despite the applicant's submission of proof of citizenship with their application. Defendant denies all remaining allegations.

5. The allegations in the first sentence of paragraph 5 are legal conclusions to which no response is required. To the extent that a response is required, Defendant responds that the statute speaks for itself. Additionally, Defendant responds further stating that mandatory training by the Secretary of State's office *does* instruct election officials to check their files for proof of citizenship documents that may have been submitted with the application. Defendant denies all remaining allegations.

6. Defendant denies that the match process with DDS is an "exact match" as defined by Plaintiffs. Defendant states that the Inspector General's report speaks for itself. Defendant denies any remaining allegations.

7. Defendant admits only that HB 268 was introduced and signed into law in 2017. Defendant denies that HB 268 is a substantially similar HAVA verification process to the process that was the subject of the 2016 litigation. In particular, the prior process provided voters only a 40 day window to correct a no-match. HB 268 provides registration applicants 26 months, thereby including at least one federal election wherein applicants can verify their identity while voting and move from pending status to active status. Defendant denies all remaining allegations.

8. Defendant denies that the HAVA verification process produces a “high rate of erroneous ‘no-matches,’” and therefore lacks sufficient information to admit or deny any alleged disproportionate racial impact.

9. Defendant admits that pursuant to the HAVA verification process in place between 2013 and 2016, approximately 38,000 voter registration applications were cancelled and then returned to pending status as part of the settlement in *NAACP v. Kemp*, CA No. 2:16cv219-WCO. Defendant lacks knowledge or information sufficient to respond to the racial breakdown of the exact voter applicant pool described by Plaintiffs, but admits that the racial breakdown of the pool of voter applicants cancelled and returned to pending status is roughly as alleged by Plaintiffs.

10. Defendant denies these allegations. The 26-month clock was not implemented until Feb. 18, 2018, and therefore it will not result in the rejection of *any* pending applications prior to the 2020 Presidential election.

11. Defendant denies these allegations.

12. Defendant admits these allegations.

13. Defendant admits these allegations.

14. Defendant admits these allegations.

15. Defendant admits that Plaintiff is a Georgia nonprofit corporation.

Defendant lacks knowledge or information sufficient to respond to the remaining allegations contained in paragraph 15.

16. Defendant admits that Plaintiff is a Georgia nonprofit corporation.

Defendant lacks knowledge or information sufficient to respond to the remaining allegations contained in paragraph 16.

17. Defendant admits that Plaintiff is a nonprofit organization. Defendant

lacks knowledge or information sufficient to respond to the remaining allegations contained in paragraph 17.

18. Defendant admits that Plaintiff is a nonprofit organization. Defendant

lacks knowledge or information sufficient to respond to the remaining allegations contained in paragraph 18.

19. Defendant admits that Plaintiff is a nonprofit organization. Defendant

lacks knowledge or information sufficient to respond to the remaining allegations contained in paragraph 19.

20. Defendant admits that Plaintiff is a nonprofit organization. Defendant

lacks knowledge or information sufficient to respond to the remaining allegations contained in paragraph 20.

21. Defendant admits that Plaintiff is a nonprofit organization. Defendant lacks knowledge or information sufficient to respond to the remaining allegations contained in paragraph 21.

22. Defendant admits that Plaintiff is a nonprofit organization. Defendant lacks knowledge or information sufficient to respond to the remaining allegations contained in paragraph 22.

23. Defendant admits that at the time this complaint was filed, Brian Kemp was Georgia's Secretary of State. Robyn A. Crittenden is currently Georgia's Secretary of State. She is automatically substituted as a Defendant by operation of Rule 25(d), Fed. R. Civ. Proc. The remaining allegations characterizing Defendant's statutory duties are conclusions of law and Defendant responds that the statutes speak for themselves.

24. The allegation in paragraph 24 is a legal conclusion to which no response is required. To the extent that a response is required, Defendant responds that the statute speaks for itself.

25. The allegations in Paragraph 25 purport to characterize the requirements and meaning of a federal statute, and the meaning of a statute is a conclusion of law as to which no response is required. To the extent that a response is required, the Secretary responds that the statute speaks for itself.

26. The allegations Paragraph 26 are too vague to permit response because it is not clear what Plaintiffs mean by “alleviate other voter identification requirements.”

27. The allegations in Paragraph 27 purport to characterize the requirements and meaning of a federal statute, and the meaning of a statute is a conclusion of law as to which no response is required. To the extent that a response is required, the Secretary responds that the statute speaks for itself.

28. The allegations in Paragraph 28 purport to characterize the requirements and meaning of a federal statute, and the meaning of a statute is a conclusion of law as to which no response is required. To the extent that a response is required, the Secretary responds that the statute speaks for itself.

29. The allegations in Paragraph 29 purport to characterize the requirements and meaning of two federal statutes, and the meaning of a statute is a conclusion of law as to which no response is required. To the extent that a response is required, the Secretary responds that the statutes speak for themselves.

30. The allegations in Paragraph 30 purport to characterize the requirements and meaning of a federal statute, and the meaning of a statute is a conclusion of law as to which no response is required. To the extent that a response is required, the Secretary responds that the statute speaks for itself.

31. The allegations in Paragraph 31 purport to characterize the requirements and meaning of a federal statute, and the meaning of a statute is a conclusion of law as to which no response is required. To the extent that a response is required, the Secretary responds that the statute speaks for itself.

32. The allegations in Paragraph 32 purport to characterize the requirements and meaning of a federal statute, and the meaning of a statute is a conclusion of law as to which no response is required. To the extent that a response is required, the Secretary responds that the statute speaks for itself.

33. Defendant denies these allegations.

34. The allegations in Paragraph 34 purport to characterize the requirements and meaning of a state statute, and the meaning of a statute is a conclusion of law as to which no response is required. To the extent that a response is required, the Secretary responds that the statute speaks for itself.

35. The allegations in Paragraph 35 purport to characterize the requirements and meaning of a state statute, and the meaning of a statute is a conclusion of law as to which no response is required. To the extent that a response is required, the Secretary responds that the statute speaks for itself.

36. Defendant admits only that applications are rejected after twenty-six (26) months if the applicant fails to complete all steps in the registration process, including verification of identity.

37. Defendant admits only that Georgia has had a HAVA verification process prior to HB 268. *See Morales v. Handel*, 2008 U.S. Dist. LEXIS 124182, *25 (N.D. Ga. 2008) (describing that “Georgia only began to comply with the voter verification provisions of HAVA in March of 2007, when the Secretary entered into an information-sharing agreement with the DDS.”).

38. Defendant denies these allegations. *See* Response to paragraph 7 above.

39. Defendant denies that the match with DDS compares the entire first name as all that is required is a match on the first letter of the first name. Defendant denies that the match with SSA compares the entire date of birth as all that is compared is the month and year of birth. Defendant admits the remaining allegations in paragraph 39.

40. Defendant denies that a non-match is a “common event” and, as described in paragraph 39 above, denies that an “exact match” is needed as to the first name. Defendant admits the remaining allegations in paragraph 40.

41. Defendant denies that an “exact match” is needed as to the first name. Defendant admits the remaining allegations in paragraph 41.

42. Defendant admits these allegations.

43. Defendant admits the first sentence in paragraph 43. Defendant denies that clerical errors “often occur,” as alleged in the second sentence. The third sentence in paragraph 43 is a legal conclusion as to which no response is required. To the extent that a response is required, the Secretary responds that the statute speaks for itself.

44. Defendant denies that the applicant’s first name must match on anything more than the first letter of the first name when matching the DDS database, and therefore data entry errors on the first name would only lead to a non-match if the error was in the first letter. Defendant admits that if the DDS or SSA database contain incorrect information on one of the matching fields, an application with the correct information would not match.

45. Defendant lacks knowledge and information sufficient to form an opinion as to whether the SSA database is prone to errors. Defendant admits that Exhibit 1 to the complaint is a report from the Social Security Office of the Inspector General. Defendant responds further that the report speaks for itself.

46. The allegations in paragraph 46 characterize the content of a report from the Social Security Administration, Office of the Inspector General and therefore

need no response. To the extent a response is needed, Defendant states that the report speaks for itself.

47. The allegations in paragraph 47 characterize the content of a report from the Social Security Administration, Office of the Inspector General and therefore need no response. To the extent a response is needed, Defendant states that the report speaks for itself.

48. Defendant lacks knowledge or information sufficient to respond to the allegations in paragraph 48.

49. Defendant lacks knowledge or information sufficient to respond to the allegations in paragraph 49. To the extent the allegations in paragraph 49 seek legal conclusions as to a settlement agreement, Defendant states that no response is needed as the settlement speaks for itself.

50. Defendant lacks knowledge or information sufficient to respond to the allegations in paragraph 50. To the extent the allegations in paragraph 50 seek legal conclusions as to Florida state law, Defendant states that no response is needed as the statutes and regulations speak for themselves.

51. Defendant lacks knowledge or information sufficient to respond to the allegations in paragraph 51. To the extent the allegations in paragraph 51 seek

legal conclusions as to New York state law, Defendant states that no response is needed as the statutes speak for themselves.

52. Defendant admits only that one difference between HB 268 and the HAVA verification process precleared by the Department of Justice in August, 2010, is that under HB 268 the voter has 26 months to complete their voter registration application and under the prior precleared policy the voter had only 40 days. Defendant denies all remaining allegations in this paragraph.

53. To the extent the allegations in paragraph 53 seek to describe the settlement agreement in *NAACP v. Kemp*, CA No. 2:16cv219-WCO, Defendant states that no response is needed as the document speaks for itself. A copy is attached hereto as Exhibit 1. Defendant denies all remaining allegations in paragraph 53.

54. Defendant lacks knowledge or information sufficient to respond to the allegations regarding the number of “eligible” applicants that are flagged by the HAVA verification process. Defendant admits that one primary difference between HB 268 and the prior HAVA verification process, that was precleared in 2010, is that pursuant to HB 268 no voter registration applicant can be rejected until after twenty-six (26) months have passed, including one federal election cycle. Defendant denies all remaining allegations.

55. Defendant admits that if a voter registration applicant is a non-match with DDS or SSA and then fails to complete the registration process for twenty-six (26) months, the application will be rejected and the voter must then submit a new application, subject to all the same timeliness requirement as all other registration applicants.

56. Defendant denies the allegations in paragraph 56.

57. Defendant denies the allegations in the first sentence of paragraph 57. The second sentence in paragraph 57 is a legal conclusion as to which no response is required. To the extent that a response is required, the Secretary responds that the federal statute speaks for itself.

58. The allegations in paragraph 58 are legal conclusions as to which no response is required. To the extent that a response is required, the Secretary responds that the federal statute speaks for itself.

59. Defendant denies these allegations.

60. Defendant denies these allegations.

61. Defendant lacks knowledge or information sufficient to respond to the allegations regarding what assistance “many” naturalized citizens receive and what information these citizens include with their voter registration applications that are sent to their county registrar.

62. Defendant admits the first and second sentence of paragraph 62. The allegations in the third sentence of paragraph 62 are too vague to permit response because it is not clear what Plaintiffs mean by “[m]any.”

63. Defendant admits only that in the past some county registrars have incorrectly placed naturalized citizens in pending status, and sent them notices, despite the submission of proof of citizenship by those applicants.

64. Defendant denies these allegations.

65. Defendant denies these allegations.

66. Defendant denies these allegations as stated. Defendant admits that registration applicants that are flagged as non-citizens must provide proof of citizenship at the polls, but deny that such voters are “required to take a trip to the county board of election on Election Day.” Defendant denies that applicants in pending status must provide proof of citizenship in person. Defendant lacks knowledge and information about what any individual voter may have been told. Defendant admits that voter registration applicants that do not respond to requests to complete the registration process are rejected after twenty-six (26) months. Defendant denies all remaining allegations.

67. Defendant denies these allegations.

68. Defendant admits that pursuant to the HAVA verification process in place between 2013 and 2016, approximately 38,000 voter registration applications were cancelled and then returned to pending status as part of the settlement in *NAACP v. Kemp*, CA No. 2:16cv219-WCO. Defendant lacks knowledge or information sufficient to respond to the racial breakdown of the exact voter applicant pool described by Plaintiffs, but admits that the racial breakdown of the pool of voter applicants cancelled and returned to pending status is roughly as alleged by Plaintiffs.

69. Defendant lacks knowledge or information sufficient to determine how many non-matches are “erroneous,” and lacks information sufficient to determine any disproportionate impact.

70. Defendant admits that after returning just over 38,000 cancelled voter registrations to pending status as a result of the *NAACP v. Kemp* litigation, and agreeing that said applicants will remain in pending status indefinitely unless the applicant completes the registration process thereby being moved to active status, by July 2018, there were approximately 51,111 voter applicants in pending status. Defendant lacks knowledge or information sufficient to respond to the racial breakdown of the exact voter applicant pool described by Plaintiffs, but admits that the racial composition of the current voter pool, including all applicants that were

part of the *NAACP v. Kemp* settlement class, approximates the racial breakdowns alleged by Plaintiffs.

71. Defendant denies these allegations.

72. Defendant denies these allegations.

73. Defendant denies these allegations.

74. Defendant lacks knowledge or information sufficient to respond to these allegations. Defendant responds further that the allegations in paragraph 74 of the complaint purport to report data from the 2016 American Community Survey (ACS) and the ACS report speaks for itself.

75. Defendant lacks knowledge or information sufficient to respond to these allegations. Defendant responds further that the allegations in paragraph 75 of the complaint purport to report data from the 2016 American Community Survey (ACS) and the ACS report speaks for itself.

76. Defendant lacks knowledge or information sufficient to respond to these allegations. Defendant responds further that the allegations in paragraph 76 of the complaint purport to report data from the 2016 American Community Survey (ACS) and the ACS report speaks for itself.

77. Defendant lacks knowledge or information sufficient to respond to these allegations. Defendant responds further that the allegations in paragraph 77 of the

complaint purport to report data from the 2016 American Community Survey (ACS) and the ACS report speaks for itself.

78. Defendant lacks knowledge or information sufficient to respond to these allegations. Defendant responds further that the allegations in paragraph 78 of the complaint purport to report data from the 2016 American Community Survey (ACS) and the ACS report speaks for itself.

79. Defendant denies the allegations in paragraph 79.

80. Defendant lacks knowledge or information sufficient to respond to the allegations in the first sentence of paragraph 80. Defendant admits only that Plaintiffs have accurately reported information included in the district court's opinion. *Common Cause/Ga. v. Billups*, 439 F. Supp. 2d 1294, 1311 (N.D. Ga. 2006). Defendant lacks knowledge or information sufficient to form a belief as to the existence of any current disparities.

81. Defendant lacks knowledge or information sufficient to respond to the allegations in paragraph 81.

82. Defendant denies the allegations in paragraph 82 as stated. Defendant admits that where an applicant has provided incorrect identifying information on their voter registration application, Georgia's HAVA verification process will

require the voter to correct the information. Defendant denies that applicants are not provided clear guidance.

83. Defendant lacks knowledge or information sufficient to respond to these allegations.

84. Defendant lacks knowledge or information sufficient to respond to these allegations.

85. Defendant admits the allegation in the first sentence of paragraph 85. Defendant lacks knowledge or information sufficient to respond to the remaining allegations.

86. Defendant lacks knowledge or information sufficient to respond to these allegations.

87. The allegations in paragraph 87 of the complaint purport to quote and characterize certain court decisions and Defendant responds that the contents of these decisions speak for themselves.

88. Defendant denies the first sentence in paragraph 88 of the complaint. The remaining allegation in paragraph 88 characterizes the congressional record supporting the reauthorization of the Voting Rights Act and Defendant responds that the congressional record speaks for itself.

89. The allegations in paragraph 89 purport to characterize the requirements of a 2005 state law and therefore seeks a legal conclusion to which no response is needed. To the extent a response is needed Defendant states that the former state law speaks for itself.

90. Defendant denies these allegations.

91. Defendant admits this allegation.

92. The allegations in paragraph 92 of the complaint seek to characterize the nature and content of a published court decision and Defendant responds that he court decision speaks for itself.

93. Defendant denies the characterization of the efforts of the Office of the Secretary of State in the first sentence of paragraph 93. Defendant admits only that in 2010 there was an investigation into alleged election code violations involving a number of African-American voters in Brooks County. Defendant admits further that the Brooks County District Attorney made an independent decision to criminally prosecute some voters for election code violations and that none of the voters were convicted. The last sentence in paragraph 93 characterizes an Official Opinion of the Attorney General and Defendant responds that the Opinion speaks for itself.

94. Defendant admits only that in 2016 legislation was introduced in the Georgia Senate to make English the state's official language and the measure was not enacted. Defendant denies Plaintiffs' characterization of the effect of the proposed measure on federal law and further states that, in 2016, federal law did not require bi-lingual ballots in *any* Georgia jurisdiction. Defendant lacks knowledge or information sufficient to respond to the allegation in the last sentence of paragraph 94.

95. Defendant denies these allegations.

96. Defendant denies these allegations as stated. The initial effort to comply with the verification requirements of HAVA began in October, 2007. *See Morales v. Handle*, 2008 U.S. Dist. LEXIS 124182, *25, CA No. 1:08-CV-3172 (N.D. Ga. 2008) (describing that "Georgia only began to comply with the voter verification provisions of HAVA in March of 2007, when the Secretary entered into an information-sharing agreement with the DDS."). The allegation in the second sentence of paragraph 96 characterizes a court opinion and Defendant responds that the court opinion speaks for itself.

97. Defendant admits only that in 2008 the U.S. Department of Justice interposed an Objection, under Sec. 5 of the Voting Rights Act, to a prior effort by Georgia to comply with the HAVA verification requirements. The remaining

allegations in paragraph 97 describe the letter from the Department of Justice and Defendant responds that the letter speaks for itself.

98. Defendant admits that in 2008 the U.S. Department of Justice objected to Georgia's submission of the state's initial process seeking to comply with HAVA's verification requirements. The remaining allegations in paragraph 98 are characterizations of the Department of Justice's objection letter and Defendant responds that the letter speaks for itself.

99. The allegations Paragraph 99 are too vague to permit response because it is not clear what Plaintiffs mean by "safeguards promised in the preclearance letter." Defendant responds further that she lacks knowledge and information sufficient to respond as to the motivation of the U.S. Department of Justice.

100. Defendant denies that the current HAVA match verification process has a disproportionate burden on minority applicants.

101. Defendant denies these allegations.

102. Defendant admits only that Georgia has a majority vote requirement for all elections. Defendant lacks sufficient knowledge and information to form an opinion as to the remaining allegations in paragraph 102.

103. Defendant lacks knowledge or information sufficient to respond to the allegations in the first sentence of paragraph 103. Defendant responds further that

the remainder of paragraph 103 is a characterization of reported court cases and Defendant responds that these cases speak for themselves.

104. Defendant admits that currently all statewide elected officials are white, although Defendant Crittenden is African-American, she was appointed to the office of Secretary of State. Defendant denies that, as of 2019, African-American voters are underrepresented in the Georgia House of Representatives and the U.S. House of Representatives. Defendant lacks knowledge and information sufficient to respond to all remaining allegations.

105. Defendant admits that due to safeguards that are in place, voter fraud is rare in Georgia.

106. Defendant admits only that the primary purpose of the data verification process is to comply with HAVA and federal and state law to verify data provided by voter registration applicants with data provided to DDS. Under the provisions of HAVA, this verification process is designed to assure the identity and eligibility of voter registration applicants and to prevent fraudulent or erroneous registrations. Defendant denies all remaining allegations.

107. No response is needed for paragraph 107 of the complaint.

108. Defendant admits only that the quoted text accurately quotes Sec. 2 of the Voting Rights Act. Plaintiffs' characterizations of the protections of Sec. 2 are legal conclusions and Defendant responds that the statute speaks for itself.

109. Defendant denies these allegations.

110. Defendant denies these allegations.

111. Defendant denies these allegations.

112. Defendant denies these allegations.

113. Defendant denies these allegations.

114. Defendant denies these allegations.

115. No response is needed for paragraph 115 of the complaint.

116. The allegations in paragraph 116 of the complaint are legal conclusions regarding certain constitutional protections and Defendant responds that the constitutional provisions and cases cited speak for themselves.

117. Defendant denies these allegations.

118. Defendant denies these allegations.

119. Defendant denies these allegations.

120. Defendant denies these allegations.

121. Defendant denies these allegations.

122. Defendant denies these allegations.

123. No response is needed for paragraph 123 of the complaint.

124. Defendant admits only that the quoted text accurately quotes certain language in the NVRA. No further response is required and to the extent that further response is deemed required, Defendant responds that the statute speaks for itself.

125. The allegations in paragraph 125 of the complaint are legal conclusions and Defendant responds that the NVRA speaks for itself.

126. The allegations in paragraph 126 of the complaint are legal conclusions and Defendant responds that the NVRA and congressional record speak for themselves.

127. Defendant denies these allegations.

128. Defendant denies these allegations.

129. Defendant admits only the first three sentences in paragraph 129 of the complaint. Defendant denies all remaining allegations.

130. Defendant denies any and all other allegations in the Complaint not referred to herein specifically, denies all prayers of the complaint, and denies that Plaintiffs are entitled to any relief in this case.

WHEREFORE, Defendant respectfully requests that the Court dismiss this action in its entirety.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on December 17, 2018, I electronically filed
DEFENDANT'S ANSWER with the Clerk of Court using the CM/ECF system
which will automatically send e-mail notification of such filing to the following
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This 17th day of December, 2018.

/s/ Cristina Correia

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