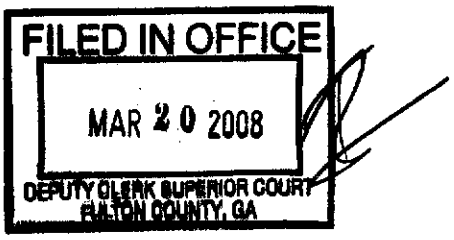
IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA



GARLAND FAVORITO, MARK SWAYER RICARDO DAVIS, AL HERMAN, FRIEDA SMITH, KATHRYN WEITZEL, ADAM SHAPIRO, and CATHIE CALABRO,	*	
Plaintiffs,	*	
v.	*	**CIVIL ACTION FILE NO. 2006CV119719**
KAREN HANDEL, Secretary of State, SONNY PERDUE, Governor of the State of Georgia, GEORGIA STATE ELECTION BOARD,	*	
Defendants.	*	

STATEMENT OF UNDISPUTED FACTS
BY DEFENDANTS

COME NOW KAREN HANDEL (in her official capacity as Secretary of State of Georgia), SONNY PERDUE (in his official capacity as Governor of Georgia), and the STATE ELECTION BOARD of the State of Georgia, Defendants herein, and pursuant to Uniform Superior Court Rule 6.5 show that no genuine issue of material fact exists to the following facts:

I. PROCEEDINGS BELOW

1.

This case was initiated with a complaint filed by Plaintiffs in July 2006. [Complaint.] That Complaint, spanning 76 numbered paragraphs, asserted the following:

Count I: "The definition of ballot set by O.C.G.A. § 21-2-280 is unconstitutional";

Count II: "Use of DVMS Deprives The People from Conducting Elections by Unconstitutionally Delegating Critical Election Functions to Machine Processes that Cannot be Verified or Audited by the People";

Count III "The current DVMS Implementation Does Not Comply with O.C.G.A. § 21-2-379.1"

Count IV: "The DVMS, As Configured, Deny Candidates and their Supporters Their Rights to Fair Recounting of Votes in Close Elections"

Count V: "Use of DVMS denies Equal Protection for Electronic Voters vs. Absentee/Pre-election voters"

Count VI: "Georgia's Audit Trail Pilot Project to comply with Voting Accuracy and Correctness Law Cannot Safeguard the Rights of the People to provide Assurances Against Future DVMS Failures";

Count VII: "The Audit Trail Pilot Project,[sic] Unconstitutionally Undermines the Affected Voters Rights to a Secret Ballot"; and

Count VIII: "Mandamus."

[*Id.*]

2.

Defendants accepted service by acknowledgment and answered, addressing in their Answer each paragraph of the Complaint in specifics. [Answer.] The Answer also asserts several affirmative defenses, including the impropriety of mandamus, injunction, and declaratory judgment (which applies to some of the claims), and an absence of standing (which applies to some of the claims). [*Id.* at pp. 1-2.]

3.

The Complaint was then amended adding a Count Nine and a number of paragraphs and subparagraphs, which have been withdrawn. [*See* First Amendment to the Complaint; Deposition of Garland Favorito ("Favorito dep."), filed herewith, at p. 230 (stipulation of withdrawal of Count Nine).] It was again amended to apparently make party Plaintiff changes [Second Amendment to the Complaint], and was then amended again adding 25 more numbered paragraphs and asserting the following claims:

Count X: (Unlabeled but appears to claim that the touchscreen voting system in Georgia has been uncertified);

Count XI: (Unlabeled but appears to claim that an insufficient audit trail exists for the touchscreen voting system).

[Third Amendment to the Complaint.]

4.

Discovery was extended multiple times in this case, with the Complaint being amended twice shortly before discovery expired. The final amendment called for the parties to file any motions for summary judgment on or by March 20, 2008. [January 2008 extension of discovery.] This motion is filed in accordance with that timetable.

II. STATEMENT OF FACTS

5.

Eight years ago, in 2000, many people in the United States became concerned about the state of voting systems used in various States due to the extraordinary difficulties in determining the winner of the Presidential electoral vote in Florida. *See Bush v. Gore*, 531 U.S. 98 (2000) (describing the situation); *Palm Beach County Canvassing Bd. v. Harris*, 772 So. 2d 1220 (Fla. 2000), *rev. by Bush, supra* (same); *Gore v. Harris*, 772 So. 2d 1243 (Fla. 2000) (same). This situation involved manual recounts of ballots with obscure methods of trying to divine "voter intent" by reading the "hanging chads" of voter punch-cards and ultimately led to an election which required the Supreme Court to issue a ruling to resolve the dispute as to who was President. *Id.* some of what went on was described by the Supreme Court as follows:

> A monitor in Miami-Dade County testified at trial that he observed that three members of the county canvassing board applied different standards in defining a legal vote. 3 Tr. 497, 499 (Dec. 3, 2000). And testimony at trial also revealed that at least one county changed its evaluative standards during the counting process. Palm Beach County, for example, began the process with a 1990 guideline which precluded counting completely attached chads, switched to a rule that considered a vote to be legal if any light could be seen through a chad, changed back to the 1990 rule, and then abandoned any pretense of a *per se* rule,

> only to have a court order that the county consider dimpled chads legal. This is not a process with sufficient guarantees of equal treatment.

531 U.S. at 106-107. The machines used in Florida were punch card voting machines, lever machines, optiscan machines, and paper ballots. *Bush, supra; Palm Beach County Canvassing Bd., supra; Gore v. Harris, supra.*

6.

In response Congress enacted the Help America Vote Act ("HAVA"). 42 U.S.C. § 15301 *et seq.* [*See also* Affidavit of Raymond O. Cobb ("Cobb aff."), filed herewith, ¶ 9.] HAVA expressly authorized the federal government to make payments to States to replace their punch card, lever machine, and other outmoded voting systems. 42 U.S.C. § 15301. HAVA likewise created the Election Assistance Commission ("EAC") and a formal Technical Guidelines Development Committee ("TGDC") to, among other things, set standards, guidelines, and assistance for the implementation of new systems in the States. [See Deposition of Cathy Cox ("Cox dep.") at pp. 14-15.] 42 U.S.C. § 15321 *et seq.* Defendants' witness Dr. Brittain Williams is a member of the TGDC and has been substantially involved in drafting standards, guidelines and certification protocols put out by the EAC and the TGDC. [Cobb aff. At ¶ 8; deposition of Dr. Brittain Williams ("Williams dep.") at pp. 5, 23.]

7.

During the 2000 Presidential election Georgia experienced similar problems to Florida's, though these problems were not widely publicized. [Cox dep. at pp. 26-27, 44; Cobb aff. at ¶ 9.] Georgia began investigating how to improve its system (in fact, of course issues as to improvement are always considered, and Dr. Williams had been looking at related certification issues for Georgia since 1988). [*Id.*; Williams dep. at pp. 10, 20; *see also* Williams dep. at p. 37 for an example of implementing changes to improve the system.] A study commission was formed

(the Twenty-first Century Voting Commission), an RFP was issued, bids were received and considered, and a contract was awarded to Global Management Systems, Inc., which later was purchased by Diebold Election Systems, Inc. (hereinafter collectively "Diebold"). [Deposition of Michael Barnes ("Barnes dep.") at pp. 6-12; Cox dep. at pp. 6-8, 10-16, 26-28, 34-44; Williams dep. at pp. 12-17.]

8.

In this process, the authority to determine what voting system to use was expressly granted by the General Assembly to the Secretary of State (who, with the State Election Board, has also has authority regarding numerous election matters in Georgia). O.C.G.A. §§ 21-2-50.2, 21-2-300, 21-2-379.2; *see also* §§ 21-2-30 *et seq.* (State Election Board), 21-2-50 (general duties of Secretary of State), 2005 Op. Att'y Gen. 2005-3 (discussing allocation of duties and authority between Secretary of State and State Election Board (of which the Secretary of State is the chair)). [*Cf.* Williams dep. at 15, 23.] Of the seven companies making electronic voting machines who submitted bids only three met all certification requirements, and only Diebold met the requirements and could deliver voting machines in a timely matter to meet the State's needs. [Barnes dep. at pp. 6-8, 24-25; Cox dep. at pp. 27-29; Williams dep. at pp. 14-17.] The funds to purchase such machines was expressly authorized by the Georgia General Assembly. 2002 Ga. Laws 598 *et seq.*

9.

In this process, Georgia was the first state to implement a uniform system of touchscreen voting across the State. [Cox dep. at pp. 12-13, 42.] *See* O.C.G.A. § 21-2-379.3. The initial money for this system, as approved by the General Assembly, came from the sale of bonds as the initial purchase predated HAVA's enactment. [Cox. dep. at pp.13-14, 46.] Officials from Georgia,

however, were well aware of the pending HAVA legislation in Congress, which passed a few months later (specifically, October 2002): HAVA funds reimbursed the State the initial $54 million cost to implement the system. [*Id.* at pp. 13-16, 46; Cobb aff. at ¶ 9.] *See* 42 U.S.C. § 15301 (notes as to date of enactment of HAVA).

10.

Georgia's system of touchscreen voting machines was also unique in creating an independent center – the Center for Election Systems at Kennesaw State University – which has become a world leader on election systems. [Cobb aff. at ¶¶ 3, 8; Williams dep.] As stated by its former director, Ray Cobb, "Among its many functions the Center is involved in overseeing the implementation and use of touchscreen voting systems at polling places throughout Georgia, designing the ballots used at most of the precincts in Georgia, and implementing and maintaining the software and hardware used in elections involving touchscreen voting machines in Georgia." [Cobb aff. at ¶ 3.] Unlike other States' systems, the Center is significantly involved in security protocols and monitoring, as well as testing of voting machines for certification. [*Id.* at ¶¶ 3, 4, 7, 8; Williams dep. at pp. 7, 41-78; Barnes dep. at pp. 19-24, 33-39.]

11.

The total system involved in electronic voting, in this regard – and as monitored and partially assisted in creation independently at the Center – includes (excluding incidental equipment like modems, testing equipment, etc.) computer hardware (or which there are servers both at the State level and at the county level, touchscreen voting machines, and electronic poll books which check voter registration, as well as, of course, testing equipment), computer software (including software programs in the different servers used and the

touchscreen voting machines),[1] computer media (including electronic Voter Access Cards (i.e. a "smartcard") and other PCMCIA cards used for transferring data), and the protocols and methods by which the system is implemented and its security maintained. [*See* Barnes dep. 33-34; Cobb dep. *passim*; Cobb aff. *passim*.]

12.

No touchscreen voting systems were eligible for purchase in Georgia unless they met federal certification requirements first. [Cobb aff. at ¶ 7; Barnes dep. at pp. 7-8, 19-21.] Such systems are then tested and certified again at the State level. [*Id.*] As summarized by Mr. Cobb in his affidavit:

> Georgia uses only electronic hardware and software that is certified at the federal level. After that equipment is certified, it is then again tested by KSU for the State and then certified by the State. The combination of hardware and software used in Georgia is unique. It is not used in California, Ohio, Maryland, Nevada, Colorado or any other state or district in the United States that uses electronic voting. Georgia also has unique protocols and procedures – including the maintenance of the KSU Center for Election Systems as an independent entity to review and monitor voting in Georgia.

[Cobb aff. at ¶ 7; *see also* Williams dep. *passim*; Barnes dep. *passim*.]

13.

Following testing and certification and purchase, the individual units received are then tested again on receipt and distributed to local jurisdictions – a form of testing called "acceptance testing." Ga. Comp. R. & Regs. 183-1-12-.02(2)(a). [Barnes dep. at pp. 19-21] There they are kept under lock and seal by law, with highly regulated conditions as to the

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[1] The primary software used is a proprietary system customized for Georgia called the Global Election Management System ("GEMS"). GEMS is used for a variety of purposes including among other things preparing ballots, displaying ballots, tabulating votes, and preparing and displaying reports and summaries of vote results. [Cobb aff. at ¶ 4.] As used at the local level this software is only distributed in an executable format, and it cannot be altered at the local level. [Cobb. dep. at p. 16.]

circumstances in which they must be kept. *See, e.g.*, Ga. Comp. R. & Regs. 183-1-12-.02(2)(b)-(g). If at any time it is learned of a possible compromise to equipment, that equipment is re-tested and cannot be used until it is re-tested. [Cobb dep. at pp. 17-18.] The software is checked by generating a source code file known as "hash code" which is then checked against the potentially compromised equipment. [*Id.*] Although repeatedly checking and testing for the possibility, no electronic compromise or hacking of any voting machine in Georgia has ever been discovered, and the chance of it occurring are, in fact, miniscule. [Cobb. dep. at pp. 26, 27, 32; Barnes dep. at pp. 22, 33-34; Williams dep. at pp. 39-41; 58, 69-78; Cox dep. at pp. 46-47.] Georgia's voting machines, for example, are never connected to the internet, which would be a source of computer "Trojans" and viruses. [*See* Cobb aff. at ¶ 7; Barnes dep. at p. 22 (discussing why no Trojans.]

14.

At the time of an election, each of the pieces of equipment in the system – including even computer media – are again tested to assure that they have not been tampered with. [Cox dep. at pp. 29-30, 46-47; Barnes dep. at pp. 19-20, 33.] Ga. Comp. R. & Regs. 183-1-12-.02(3)(b) (detailing requirements at length). This testing is open to the public. *Id.*

15.

Each precinct in Georgia – even in a federal election – has a unique ballot at an election since each precinct has its own local officials seeking office and issues put to the electors. As described by Ray Cobb:

> There are approximately 3200 precincts in Georgia. Each precinct has unique ballots depending on the federal, state, and local offices and issues being voted on in that precinct. Thus, for instance, in the general election that will be held on November 4, 2008, there will be thousands of different ballot designs. The physical location of candidate names on a ballot varies for each ballot because of

> the different races that are applicable for each ballot design. The ballots are usually finished for an election 60 days before the election.

[Cobb aff. at ¶ 5.]

16.

The idea that touchscreen voting equipment is subject to malicious code inserted into the machines in advance – an idea that Plaintiffs repeatedly floated at the depositions in the case and in written discovery – is a chimera. That is because the person doing it in advance could not know the ballot design which varies widely by precinct and is not known by anybody until shortly before an election. [Cobb dep. at p. 31.] As explained by Mr. Cobb at his deposition:

> The only way software can be written to change the votes is to have a knowledge of who's on the ballot, what party they belong to, where they're physically located on the touch screen.
>
> The software we have was installed in 2005. There's no way a person could know to modify that software in 2005 that says who's on the ballot in 2007, who's there, what party are they, where are they located on which page of the touch screen.
>
> That's why I contend the likelihood of modifying software and then getting modified software into the machine with the security procedures that we have – nothing is absolute but I don't believe it can be done. Can I expand a little more?
>
> Q. Sure.
>
> A. When our software was installed we had a Democratic governor, which meant all Democratic candidates appeared first on the ballot. In 2006 we have a Republican governor. Is that right? I'm sorry. 2004 we had a Republican governor. That order switched and so all Republican candidates appeared first. How would that be known to somebody to modify the software beforehand?

[*Id.*]

17.

The idea, for instance, that Diebold could determine the outcome of an election by secretly making machines or software to yield certain results, which the Plaintiffs have repeatedly asserted in discovery, is simply not tenable (if not entirely impossible), at least in Georgia. Diebold does not have access to the ballot designs and could not design Trojan

software to find the right place on the touchscreen or to mimic the actual ballots. [*Id.*; see also Cox dep. at pp. 30-31, 46-47; Williams dep. at pp. 63, 67, 70; Barnes dep. at pp. 22, 32.]

18.

On election day the Center also conducts random parallel testing of voting machines. [Cobb. dep. at pp. 34-35; Barnes dep. at 38-39; Williams dep. at pp. 46, 75-76.] This has been described as follows:

> But basically on parallel testing what we do is we randomly select precincts and randomly select machines and set them up in the back room here and during election using the actual – the same database, election database that's used in those counties and in those precincts, we conduct a controlled vote where voters are given a script to vote and two people stand there. One calls it out and watches what's happening and the other one votes as a check that it's entered accurately.
>
> And the video cameras record that and then at the end of the day we close the polls. We print those ballot images out and have an independent person count those ballot images manually. We don't tell them what the answer is.
>
> And when they get them counted then we compare that to the electronic record and they've got to match a hundred percent.
>
> I believe one time – now, this is from memory so this may not be a hundred – there may have been another one, but to my knowledge, there was only one time that there was a one vote difference and we went back to the video cameras and actually found where one of the voters had hit the wrong button. So yes, that is an independent record of the vote.

[Williams dep. at pp. 75-76.]

19.

This system assures that there is no state-wide swapping out of software or results, since it would be discovered by the parallel test. Likewise, since which jurisdictions will be subject to parallel testing is not known by other than those conducting it, local attempts to subvert results can be discovered; again, no such fraudulent attempts by electronically manipulating the ballot or the votes has ever been discovered under electronic voting. [Cobb. dep. at pp. 26, 27, 32; Barnes dep. at pp. 22, 33-34; Williams dep. at pp. 39-41; 58, 69-78; Cox dep. at pp. 46-47.]

20.

The Plaintiffs have expressly disclaimed any government conspiracy as to voting in Georgia. [Plaintiffs' Responses to Defendants' First Interrogatories at ¶¶ 5, 6 (originals to be filed by Plaintiffs).]

21.

The process of voting by electors at the polls and the subsequent tabulation of votes is set out in several statutes in Georgia. In his affidavit Mr. Cobb factually summarizes this process:

> When voting at the polls in Georgia, each voter (or elector) first fills out a certificate which also identifies election, the voter, and in case of a primary election, the party. The voter's identification is then checked. The voter's certificate is then checked to make sure he or she is properly registered. Each voter then receives a voter access card, which is a smart card containing the election ID, the precinct ID, and the ballot style number appropriate for the voter. When the card is inserted in a touchscreen voting machine, the proper ballot is displayed (or spoken for hearing impaired voters), and the voter then votes by selecting his or her choices on the electronic ballot by touching the screen. After going through the ballot, the voter then views a screen which allows the voter to confirm his vote. If the vote does not match his selections he can go back and change them. Once the votes are cast, they are recorded on a flash card, as well as on the touchscreen voting machine. The flash card is taken to a central computer referred to as the server at the county office, where the votes are tabulated, and unofficial results are then transmitted by each county to the Secretary of State's Office, where they are then again tabulated and compiled. The unofficial votes are transmitted by the county over a phone line using a private number; at no time are the touchscreen voting machines or the servers at the county connected to the internet. After the county has certified the election, the official votes are placed on a CD and taken to an assigned State Patrol office where they are picked up by employees of the Office of the Secretary of State and taken to the State Elections Division. The votes are then tallied for federal and state races and certified by the Secretary of State.

[Cobb aff. ¶ 6.]

22.

The elector's votes cannot be traced back to the elector because he or she is not identified with a particular voter access card. [*Id.*] Once the card is voted and turned it, no one knows

which voter voted that card. [*Id.*] It should be noted that the meaning of what is the "ballot" is set by several statutes and a regulation, discussed in the text, below. *See, e.g.,* O.C.G.A. §§ 21-2-2(2), 21-2-2(18), 21-2-280; 21-2-379.4; Ga. Comp. R. & Regs. 182-1-12-.02(1)(a) (specifically for electronic voting: "Ballot shall mean the offices, candidates, and questions, to be submitted to the voters at a primary, election, or runoff for each county or municipality"). The ballot in an electronic machine – which takes electronic data from software and electronic media and uses that to display information on a screen and then stores such results back on the media –involves the combination of several things, hardware and software – operating together to create and display the ballot. [*See* Cobb. dep. at pp. 10-16, 42; Cox dep. p. 33.]

23.

After the election the voter's ballot can be displayed and printed (although it is not identifiable to a specific elector, as above maintaining the elector's secrecy). [Cobb dep. at p. 5-7, 28; Cox dep. at p. 10; Barnes dep. at p. 16.] The touchscreen voting machines also have a paper printout (internal in the machine) which records the votes cast. [Cox. dep. pp. 10, 38; Cobb dep. pp. 7, 28.] A printed receipt given to a voter, however, while it may cause, comfort, is not technically necessary and would give rise to malice, as those who which to subvert the system could easily print their own "fake" receipts "any way they want them.' [Williams dep. at pp. 39, 40.] As explained by former Secretary of State Cathy Cox:

> I have certainly learned about people who would love to cause mischief in elections and would love to stick that receipt in their pocket and walk on out so the vote totals don't reconcile at the end of the day.
>
> There are people who would love to pay people for voting. If that voter could walk out the door with a receipt and prove that they voted for or against a candidate in order to get illegal remuneration, you have a problem.

[Cox dep. at pp. 35-36.]

24.

The paper trail created by the machines allows their results to be physically audited, as does the numerous electronic information from the servers, voter cards, PCMCIA cards, and touchscreen machines. [Barnes dep. at pp. 16, 18-19, 24; Cobb dep. at pp. 33-35; Williams dep. at pp. 12-13, 24, , 27, 29-30.] Witness after witness explained without dispute that these materials generate an audit trail by which the performance of the machines and election results can be and are examined. [*Id.*; *see, e.g.*, Williams dep. at 24.]

25.

Any voter in Georgia, however, who does not wish to vote with the electronic voting system can vote – for any reason – with a mail-in absentee ballot. O.C.G.A. § 21-2-380 *et seq.* A mail-in ballot is a paper ballot. *See, e.g.*, O.C.G.A. §§ 21-2-383 to 21-2-385.

26.

Voters at the polls, however, can be confident in the outcome. The votes are tabulated in public and posted locally. [Williams dep. at p. 45.] Such results are also sent to the Center at KSU, where they can be checked against the local results. [Cobb. aff. ¶ 6.] A voter likewise knows who he or she voted for at the time of voting because voters can check their ballot after making their selections to make sure their votes are identified for the right candidates or issues. [Cox. dep. at pp. 29-30.] And voters have had a very high confidence in the system with survey after survey showing that over 80% of Georgia voters have confidence in the voting system. [Williams dep. at p. 73.]

27.

The voters' confidence in the system is justified. Again, as stated by Mr. Cobb:

> While no system is theoretically free from errors, the error rate for "over votes" (where more than one vote is cast for a race, so the vote is not counted) has declined to 0, since the touchscreen voting machines will not allow this to occur. Likewise, the rates for "under votes" (where no vote is cast in a particular race) has substantially declined compared with the previous systems.

> In the 2000 election, the undervote in Georgia for the presidential race was 3.5%, equating to 96,000 voters who voted in the election but did not vote for a presidential candidate. The undervote for the top race on a ballot is recognized as a measure of a successful election. Using the electronic voting system in the 2004 election, the undervote for president was less than 0.4%, indicating a nine-fold improvement over the election in 2000. Indeed, in the 2000 general election, Georgia had similar problems to the highly publicized problems in Florida. Georgia was at that time like Florida was using a combination of lever machines, punch cards, optical scan machines, and paper ballots. The prior methodologies used were also highly susceptible to fraud (for instance, fake paper ballots are easy to create, and real paper ballots are easy to destroy) compared with electronic touchscreen voting. Indeed, in Georgia's history, like other states, there is a history of voter and election fraud – including defrauding voters and candidates on racial lines – which touchscreen voting helps prevent. Studies have shown that touchscreen voting is easier for poorly educated and illiterate voters to use. It also allows blind voters to vote without assistance when casting their ballot (since the system allows the ballot to be read to them); the previous systems of voting in Georgia did not do this. Electronic touchscreen voting is in my opinion the most reliable system of voting available and is the system that best protects the vote and the secrecy of the ballot.

[Cobb aff. at ¶ 9; *see also* Cox dep. at p. 44 (explaining same results).]

28.

The Plaintiffs repeatedly raised the fact at the depositions, and in some written discovery, that this suit is the culmination of a long standing effort by the Plaintiffs – notably Mr. Favorito, the lead Plaintiff who testified on behalf of the other Plaintiffs – to oppose Georgia's electronic touchscreen voting system. [*See, e.g.*, Barnes dep. at pp. 10-14 (see also exhibits attached to the deposition); Williams dep. at 31-35 (see also exhibits attached to the deposition); Deposition of Garland Favorito ("Favorito dep.") at pp. 48-72; *see also* Favorito dep. at pp. 5-6 (stipulation that Mr. Favorito's testimony applied to and was binding on all Plaintiffs).] This is not the first case in Georgia where this has arisen. *See Smith v. DeKalb County*, 288 Ga. App. 574 (2007)

The Plaintiffs are entitled to their views as to electronic voting. They are entitled to – indeed, they are *encouraged* to – vigorously question the system. However, they are not entitled to go forward on claims that are without merit in law or fact. This is a case where there is no merit to the Plaintiffs' claims as shown by the undisputable facts. Defendants are, therefore entitled to summary judgment.

Respectfully submitted,

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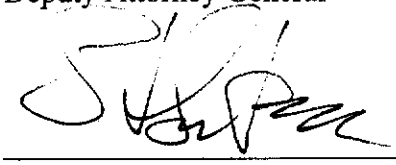

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CERTIFICATE OF SERVICE

This will certify that I have this day caused to be served a copy of the within and foregoing MOTION FOR SUMMARY JUDGMENT BY DEFENDANTS upon the Plaintiffs by by placing the same in the United States Mail, postage prepaid, addressed to:

WALKER CHANDLER, ESQ.
15 Jackson Street
P.O. Box 7
Zebulon, GA 30295

This 20 day of March, 2008.

STEFAN RITTER
Senior Assistant Attorney General