

**ASSOCIATION OF COMMUNITY ORGANIZATIONS  
FOR REFORM NOW, ET AL.**

**V.**

**CATHY COX, ET AL.**

# **EXHIBIT 1**

To Plaintiffs' Brief in Support of  
Motion for Preliminary Injunction



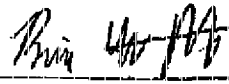
ACORN was an active advocate for the National Voter Registration Act of 1993 and was the lead plaintiff in a number of the challenges against states that refused to implement it.

6. ACORN conducts voter registration drives because the more registered voters in a community served by ACORN means ACORN can encourage more people to vote on election day and get a higher turnout of voters, all of which strengthens the community.
7. ACORN has been conducting non-partisan organized voter registration drives since 1982. In 2004 ACORN submitted over 1,100,000 voter applications nationwide.
8. In its Southern Region, ACORN has several current initiatives, including a campaign to eliminate and redress lead paint poisoning in lower-income communities, development of financial justice centers to combat predatory lending practices, and efforts to raise the minimum wage.
9. As Southern Regional Director, I am responsible for voter registration efforts conducted in the region, including Georgia.
10. In 2004, ACORN and Project Vote jointly achieved the registration of roughly 20,000 new voters in lower-income communities in Georgia. Most of those new voters were in the metropolitan Atlanta area.
11. ACORN's plans for 2006 included conducting a voter registration drive in Georgia which would aim at the registration of 5,000 to 10,000 new voters from lower-income communities. These plans have been disrupted by Georgia's new rules on voter registration drives, specifically the requirements that voter

registration applications be sealed before they are delivered to a voter registration worker, and the prohibition against copying of such applications. Those Georgia rules defeat the ordinary procedures followed by ACORN and Project Vote in order to ensure an effective voter registration effort. As a result of these new Georgia rules, we have not been able to secure financial support for a voter registration drive in Georgia in 2006. It appears that so long as those rules are in effect, we will not be able to mount such a voter registration drive in Georgia.

I solemnly affirm under the penalties of perjury and upon personal knowledge that the contents of the foregoing paper are true.

August, 12, 2006  
July \_\_, 2006  
Atlanta, Georgia

  
\_\_\_\_\_  
Brian Kettering