

IN THE  
SUPREME COURT OF INDIANA

CASE NO. \_\_\_\_\_

LEAGUE OF WOMEN VOTERS )  
OF INDIANA, INC., and LEAGUE )  
OF WOMEN VOTERS OF )  
INDIANAPOLIS, INC., )

Appellants (Plaintiffs Below), )

v. )

TODD ROKITA, in his official capacity, )  
Indiana Secretary of State, )

Appellee (Defendant Below). )

On Petition to Transfer from the  
Indiana Court of Appeals  
49A02-0901-CV-00040

An Appeal from the  
Marion Superior Court  
Civil Division, Room 2  
Hon. S.K. Reid, Judge  
49D02-0806-PL-027627

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**BRIEF OF *AMICUS CURIAE* LAWYERS' COMMITTEE FOR  
CIVIL RIGHTS UNDER LAW IN SUPPORT OF APPELLANTS**

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## TABLE OF CONTENTS

	Page
TABLE OF AUTHORITIES .....	ii
STATEMENT OF INTEREST OF <i>AMICUS CURIAE</i> .....	1
INTRODUCTION AND SUMMARY OF ARGUMENT .....	2
ARGUMENT .....	4
I. <i>Crawford</i> Offers No Support To The Secretary Of State’s Petition To Transfer .....	4
II.   Indiana’s Voter ID Law Is Highly Vulnerable To Constitutional Attack.....	6
A.   The Voter ID Law Is Severely Burdensome.....	6
B.   The State Has Only A Minimal Interest In Imposing A Photo ID Requirement To Deal With The Nonexistent Threat Of In-Person Impersonation Fraud .....	9
CONCLUSION.....	13
WORD COUNT CERTIFICATE .....	15
CERTIFICATE OF SERVICE .....	16

## TABLE OF AUTHORITIES

Page

### CASES

<i>Burdick v. Takushi</i> , 504 U.S. 428 (1992).....	10
<i>Common Cause/Georgia v. Billups</i> , 406 F. Supp. 2d 1326 (N.D. Ga. 2005).....	2
<i>Common Cause/Georgia v. Billups</i> , 504 F. Supp. 2d 1333 (N.D. Ga. 2007).....	13
<i>Crawford v. Marion County Election Bd.</i> , -- U.S.--, 128 S. Ct. 1610 (2008) .....	passim
<i>Crawford v. Marion County Election Bd.</i> , 472 F.3d 949 (7th Cir. 2007) .....	10
<i>Gilmore v. Gonzales</i> , 435 F.3d 1125 (9th Cir. 2006) .....	9
<i>Gonzalez v. Arizona</i> , 485 F.3d 1041 (9th Cir. 2007) .....	2
<i>Purcell v. Gonzalez</i> , 549 U.S. 1 (2006).....	2
<i>Weinschenk v. State</i> , 203 S.W.3d 201 (Mo. 2006) .....	2, 7

### STATUTES

Ga. Code § 21-2-417.1(d)(1) .....	13
Help America Vote Act of 2002, Pub. L. No. 107-252, § 303, 116 Stat. 1666 (codified at 42 U.S.C. § 15483(b)(2)(A)) .....	12
I.C. § 3-5-2-40.5.....	2, 3
I.C. § 3-11.7-5-1(b).....	3
I.C. § 3-11.7-5-2.5(a).....	3
I.C. § 3-11-8-25.1.....	2

**TABLE OF AUTHORITIES  
(CONTINUED)**

**Page**

**OTHER AUTHORITIES**

Matt A. Barreto, et al., Washington Institute for the Study of Ethnicity and Race, Working Paper, <i>The Disproportionate Impact of Indiana Voter ID Requirements On The Electorate</i> (Nov. 8, 2007) .....	7
Brennan Center for Justice, NYU School of Law, <i>Citizens Without Proof: A Survey of Americans' Possession of Documentary Proof of Citizenship and Photo Identification</i> (Nov. 2006).....	6
Craig C. Donsanto & Nancy L. Simmons, <i>Federal Prosecution of Election Crimes</i> (7th ed. 2007).....	11
Rebecca S. Green, <i>Refusal of Vets' IDs Leads to Hard Feelings at Polls</i> , Fort Wayne J. Gazette, May 4, 2006 .....	9
John Mark Hansen, Nat'l Comm'n on Fed. Election Reform, <i>To Assure Pride and Confidence in the Electoral Process: Task Force Reports to Accompany the Report of the National Commission on Election Reform</i> (Aug. 2001).....	6, 7
Sonji Jacobs & Megan Clarke, <i>No ID? Votes cast can become castoffs</i> , Atl. J. Const., Nov. 2, 2007 .....	7
Jane L. Levere, <i>Scrambling to Get Hold of a Passport</i> , N.Y. Times, Jan. 23, 2007.....	8
Marion County Health Department, <i>Application for a Certified Birth Certificate</i> .....	8
Nat'l Comm'n on Fed. Election Reform, <i>Building Confidence in U.S. Elections</i> (Sept. 2005).....	6
<i>Retired Nuns Barred from Voting in Indiana</i> , The Guardian U.K., May 7, 2008 .....	9
Spencer Overton, <i>Voter Identification</i> , 105 Mich. L. Rev. 631 (2007) .....	12
U.S. Census Bureau, <i>Tenure by Vehicles Available by Age of Householder</i> (2000).....	8

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This brief is submitted on behalf of the Lawyers' Committee for Civil Rights Under Law as *amicus curiae* in support of the Plaintiffs-Appellants.<sup>1</sup>

**STATEMENT OF INTEREST OF *AMICUS CURIAE***

The Lawyers' Committee for Civil Rights Under Law ("Lawyers' Committee") is a tax-exempt, nonprofit civil rights organization that was founded in 1963 by the leaders of the American bar, at the request of President Kennedy, to help defend the civil rights of racial minorities and the poor. Through the Lawyers' Committee, thousands of attorneys have represented thousands of clients in civil rights cases across the country challenging discrimination in virtually all aspects of American life.

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<sup>1</sup> No counsel for a party authored this brief in whole or in part, and no person or entity other than *amicus*, its members, or its counsel contributed monetarily to the brief.

The Lawyers' Committee has decades of experience litigating individual and class action voting rights claims in federal and state courts, and is knowledgeable about the legal and policy issues relevant to this case. The Lawyers' Committee is counsel for the plaintiffs in a federal statutory and constitutional challenge to an Arizona law that requires citizens to provide proof of citizenship when they register to vote and identification when they vote in person. *Purcell v. Gonzalez*, 549 U.S. 1 (2006); *Gonzalez v. Arizona*, 485 F.3d 1041 (9th Cir. 2007); *Gonzalez v. Arizona*, No. 08-17094 (9th Cir. 2009). The Lawyers' Committee has also been counsel for plaintiffs in the federal statutory and constitutional challenges to government-issued voter photo identification laws enacted by Georgia in 2005 and 2006. *Common Cause/Georgia v. Billups*, 406 F. Supp. 2d 1326 (N.D. Ga. 2005), *injunction granted* by 439 F. Supp. 2d 1294 (N.D. Ga. 2006), *dismissed* by 504 F. Supp. 2d 1333 (N.D. Ga. 2007), *vacated* by 554 F.3d 1340 (11th Cir. 2009). And the Lawyers' Committee filed *amicus* briefs in the U.S. Supreme Court case of *Crawford v. Marion County Election Bd.*, -- U.S.--, 128 S. Ct. 1610 (2008), and in the Supreme Court of Missouri case of *Weinschenk v. State*, 203 S.W.3d 201, 206 (Mo. 2006). The Lawyers' Committee therefore has an interest in the outcome of this case and supports the position of Plaintiffs-Appellants that the Court of Appeals should be affirmed.

## INTRODUCTION AND SUMMARY OF ARGUMENT

In his Petition, Defendant-Appellee Secretary of State Todd Rokita repeatedly invokes the U.S. Supreme Court's decision in *Crawford v. Marion County Election Bd.*, 128 S. Ct. 1610 (2008), in which that Court affirmed the dismissal of a facial federal constitutional challenge to Indiana's voter ID law.<sup>2</sup> *See* Pet. to Transfer 2, 3-4, 6. The Secretary casts *Crawford* as a

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<sup>2</sup> Indiana's voter ID law, otherwise referred to as "SEA 483," *see Crawford*, 128 S. Ct. at 1613 (lead opinion), bars an individual from voting at the polls unless the voter presents a qualifying photo ID. I.C. §§ 3-11-8-25.1, 3-5-2-40.5. The photo ID must be issued by the State of Indiana or the United States, it must bear an expiration date that has not elapsed, and it must contain the voter's name in a manner that conforms to the voter's registration record.

sweeping validation of the law—as a conclusive determination that the law does not unconstitutionally burden the right to vote and is supported by adequate state interests—and implies that *Crawford* is somehow relevant to the present case. *See, e.g., id.* at 6.

Although the Lawyers' Committee takes no position generally on whether this Court's review is warranted, it believes the Secretary's reliance on *Crawford* is misplaced and raises serious concerns. It is misplaced, as explained more fully in Part I., *infra*, because *Crawford* in fact casts no doubt on the decision below. The Court in *Crawford* did not hold that the voter ID law is definitively constitutional in all respects; to the contrary, the lead opinion rejected a facial challenge to the voter ID law only on the basis of the record in that case, and indeed openly invited future as-applied challenges to Indiana's uniquely-restrictive requirements. Accordingly, *Crawford* offers no support to the Secretary of State's Petition to Transfer—and, if anything, weakens it, by identifying yet another basis for why the voter ID law might be unconstitutional.

The Secretary's reliance on *Crawford* also raises serious concerns. As discussed in Part II., *infra*, Indiana's voter ID law—which is the most restrictive of its kind in the Nation—unnecessarily, and unjustifiably, abridges the right to vote. The Lawyers' Committee believes the law is therefore highly vulnerable to future challenges under the federal Equal Protection Clause and any corresponding state constitutional provisions. And the Lawyers' Committee is concerned that unwarranted reliance on the Secretary's inaccurate description of *Crawford*'s holding might foreclose such challenges. Accordingly, if this Court decides to grant the Petition to Transfer, it should acknowledge that *Crawford* left open future facial or as-applied challenges

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I.C. § 3-5-2-40.5(1)-(4). While a voter who lacks a qualifying photo ID may cast a provisional ballot, the provisional ballot generally will be counted only if the voter—within a period of 10 days—completes the various measures necessary to acquire a qualifying photo ID from the State, and then appears in person before the county election board or circuit court clerk to present the ID. I.C. §§ 3-11.7-5-1(b), 3-11.7-5-2.5(a).

to the law under other provisions of the federal constitution—and perhaps provide guidance as to how such claims might be resolved in future cases under the state constitution.

## ARGUMENT

### I. *Crawford* Offers No Support To The Secretary Of State’s Petition To Transfer.

At various points in his Petition, the Secretary invokes the U.S. Supreme Court’s *Crawford* decision and implies that it calls into question the Indiana Court of Appeals’s judgment striking down the voter ID law. *See* Pet. to Transfer 2, 3-4, 6. The Secretary’s reliance on *Crawford* is entirely misplaced. *Crawford* produced four separate opinions—and no opinion garnered more than three votes. Although the Secretary suggests that the U.S. Supreme Court broadly upheld Indiana’s voter ID law, only three Justices would have held that the law is definitively constitutional. *See Crawford*, 128 S. Ct. at 1624 (Scalia, J., joined by Thomas, J., and Alito, J., concurring in the judgment). By contrast, six Justices concluded that the voter ID law is, or at least might be, unconstitutional on its face. The three dissenting Justices took judicial notice of facts outside the record that demonstrated the extent to which Indiana’s law “threatens to impose nontrivial burdens on the voting right of tens of thousands of the State’s citizens,” and concluded that the law was therefore facially unconstitutional. *Id.* at 1627, 1628-36 (Souter, J., joined by Ginsburg, J., dissenting); *see also id.* at 1644-45 (Breyer, J., dissenting). And the lead opinion rejected the plaintiffs’ facial challenge because it thought it inappropriate to take judicial notice of the facts relied upon by the dissents. *See id.* at 1623 n.20 (Stevens, J., joined by Roberts, C.J., and Kennedy, J.) (refusing to consider non-record evidence in the absence of “admissible evidence subject to cross-examination in constitutional adjudication”).<sup>3</sup>

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<sup>3</sup> *See also id.* at 1623 (“[O]n the basis of the record that has been made in this litigation, we cannot conclude that the statute imposes excessively burdensome requirements on any class of voters” (citation and internal quotation marks omitted)).



Indeed, the lead opinion not only left open the possibility of future facial challenges to Indiana's voter ID law, but also suggested that the law may be highly vulnerable to as-applied attacks. The lead opinion emphasized the "heavier burden" that the requirements place on "elderly persons born out-of-state, who may have difficulty obtaining a birth certificate; persons who because of economic or other personal limitations may find it difficult either to secure a copy of their birth certificate or to assemble the other required documentation to obtain a state-issued identification; homeless persons; and persons with a religious objection to being photographed." *Id.* at 1621. And although the lead opinion speculated that the severity of these burdens might be "mitigated" by the availability of provisional ballots, it recognized that the provisional-ballot process requires a voter to "travel to the circuit court clerk's office within 10 days to execute the required affidavit," and that this burdensome requirement might be unconstitutional if "wholly unjustified." *Id.* Furthermore, the lead opinion underscored that it was "difficult to understand why the State should require voters with a faith-based objection to being photographed to cast provisional ballots subject to later verification in every election when the BMV is able to issue these citizens special licenses that enable them to drive without any photo identification." *Id.* at 1621 n.19.

In sum, the Secretary is wrong in suggesting that *Crawford* definitively held the voter ID law facially constitutional. Not only did *Crawford* leave open the possibility of a future facial challenge to the voter ID law, but it also essentially invited as-applied challenges as well. Because *Crawford* ultimately highlights another reason why the Indiana Court of Appeals's decision might have been correct, it offers no support to the Secretary's Petition to Transfer or to his arguments on the merits.

## **II. Indiana's Voter ID Law Is Highly Vulnerable To Constitutional Attack.**

The Secretary's description of *Crawford's* holding is not only inaccurate but also raises serious concerns. Were this Court's opinion to accept the Secretary's characterization of that case, it might foreclose future facial or as-applied challenges to Indiana's voter ID law, even though six Justices of the U.S. Supreme Court recognized that those requirements are—or at least might be—unconstitutional under the federal Constitution. And as explained below, facts open to judicial notice demonstrate that the requirements are both severely burdensome and only minimally justified by legitimate state interests. Accordingly, if this Court grants the Secretary's Petition to Transfer, the Lawyers' Committee urges it to acknowledge *Crawford's* limited scope and the viability of future challenges—and perhaps to provide guidance as to how such claims might proceed in future cases under the state constitution.

### **A. The Voter ID Law Is Severely Burdensome.**

Indiana's voter ID law imposes material burdens, on a significant number of otherwise-eligible voters, who genuinely desire to have a voice in the democratic process. Many voters, for fully understandable reasons, possess no photo ID of the sort required by Indiana law. Studies consistently estimate that approximately 10 percent of voting-age citizens in the country—or more than 20 million individuals—lack a government-issued photo ID. See Nat'l Comm'n on Fed. Election Reform, *Building Confidence in U.S. Elections* 73 n.22 (Sept. 2005), available at [http://www1.american.edu/ia/cfer/report/full\\_report.pdf](http://www1.american.edu/ia/cfer/report/full_report.pdf) (12 percent of voting-age citizens lack a driver's license); Brennan Center for Justice, NYU School of Law, *Citizens Without Proof: A Survey of Americans' Possession of Documentary Proof of Citizenship and Photo Identification* 3 (Nov. 2006), available at <http://www.vote.caltech.edu/VoterID/CitizensWithoutProof.pdf> (11 percent of voting-age citizens lack an unexpired government-issued photo ID); John Mark Hansen, Nat'l Comm'n on Fed. Election Reform, *To Assure Pride and Confidence in the*

*Electoral Process: Task Force Reports to Accompany the Report of the National Commission on Election Reform*, No. VI: Verification of Identity (Aug. 2001) (between 6-11 percent of voting-age citizens lack driver's license or alternate State-issued photo ID).

Research at the state level further confirms that a significant portion of the population lacks government-issued ID. In the case of Indiana, a recent survey found that roughly 13 percent of registered Indiana voters lack an Indiana driver's license or an alternate Indiana-issued photo ID. See Matt A. Barreto, et al., Washington Institute for the Study of Ethnicity and Race, Working Paper, *The Disproportionate Impact of Indiana Voter ID Requirements On The Electorate*, at 18 (Nov. 8, 2007), available at [http://depts.washington.edu/uwiser/documents/Indiana\\_voter.pdf](http://depts.washington.edu/uwiser/documents/Indiana_voter.pdf). (Table 1.1b). Surveys from other states that have adopted photo ID requirements have produced similar results. For instance, the Georgia Secretary of State recently estimated that 198,000 registered Georgia voters lack a driver's license or alternate State photo ID. See Sonji Jacobs & Megan Clarke, *No ID? Votes cast can become castoffs*, *Atl. J. Const.*, Nov. 2, 2007, at 1A. The Secretary of State of Arizona estimated that 12 percent of the registered voters in that State—or 375,000 individuals—have no driver's license or State non-operator ID. See Exhibit 21, Report of R. Anthony Sissons at 8, *Gonzalez v. State of Arizona*, No. CV06-1268-PHX-ROS (D. Ariz. Aug. 31, 2006) (available at <http://moritzlaw.osu.edu/electionlaw/litigation/documents/exhibits19-24mtnforpreliminjunctionarizona.pdf>). And the State of Missouri, in its unsuccessful defense of its photo ID law, found that between 169,000 and 240,000 registered Missouri voters lack a driver's license or alternate State photo ID. See *Weinschenk v. State*, 203 S.W.3d 201, 206 (Mo. 2006).

Those results reflect the millions of voting-age Americans who lack access to a motor vehicle and thus normally would have no need to obtain a driver's license, by far the most

common form of government-issued photo ID. Census data, for instance, indicate that 10 percent of American households have no available automobile.<sup>4</sup> And while a United States passport would also satisfy Indiana's photo ID requirements, only the relatively small share of citizens who have reason to travel abroad would have occasion to obtain a passport. *See* Jane L. Levere, *Scrambling to Get Hold of a Passport*, N.Y. Times, Jan. 23, 2007 (noting State Department estimate that only 27% of American citizens own a valid passport).

Furthermore, to obtain a driver's license or a passport, a potential voter needs to have a certified birth certificate; however, in some instances, a potential voter seeking a birth certificate in order to obtain a photo ID can only obtain such a certificate by presenting valid photo ID. For example, Marion County, the largest county in Indiana, will issue a certified birth certificate to persons born there only if the application contains the affirmation of a notary that the applicant produced one of the following photo IDs: a driver's license, state ID card, passport, or military ID card. Marion County Health Department, *Application for a Certified Birth Certificate*, <http://www.mchd.com/pdf/bthcert.pdf> (last visited Nov. 3, 2009). Indiana residents born in the neighboring states of Illinois and Michigan similarly would be required to present a photo ID to obtain a certified birth certificate from those States.<sup>5</sup> Would-be voters who seek to obtain a qualifying photo ID from Indiana therefore could become trapped in what amounts to an infinite loop of photo ID requirements.

Indiana's voter ID law therefore imposes significant burdens on a large number of Indiana citizens, which has resulted in the effective disenfranchisement of numerous otherwise-eligible Indiana voters. Indeed, in the past two election cycles, the voter ID law has caused

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<sup>4</sup> U.S. Census Bureau, *Tenure by Vehicles Available by Age of Householder (2000)* (hereinafter *Tenure by Vehicles, Census 2000*), available at <http://factfinder.census.gov/servlet/CustomTableServlet>.

<sup>5</sup> Illinois: <http://www.idph.state.il.us/vitalrecords/birthinfo.htm> (last visited Nov. 3, 2009); Michigan: [http://www.michigan.gov/mdch/0,1607,7-132-4645\\_4671-9471--,00.html](http://www.michigan.gov/mdch/0,1607,7-132-4645_4671-9471--,00.html) (last visited Nov. 8, 2009).

military veterans in Indiana to be turned away from the polls on the ground that their official Veteran photo identification cards, although issued by the United States Department of Veterans Affairs, do not constitute valid photo ID, and has led to several nuns “in their 80s and 90s” being barred from voting because “they no longer had driver’s licenses.” See Rebecca S. Green, *Refusal of Vets’ IDs Leads to Hard Feelings at Polls*, Fort Wayne J. Gazette, May 4, 2006, at 4C; *Retired Nuns Barred from Voting in Indiana*, The Guardian, May 7, 2008, available at <http://www.guardian.co.uk/world/2008/may/07/uselections2008.usa>. The voter ID law’s requirements are so strict that, at present, it is more difficult to cast a vote at the polls in Indiana than to clear security when boarding a commercial airplane.<sup>6</sup>

**B. The State Has Only A Minimal Interest In Imposing A Photo ID Requirement To Deal With The Nonexistent Threat Of In-Person Impersonation Fraud.**

*Crawford* was limited in another important respect: it did not foreclose the possibility that Indiana’s interests might be found insufficiently weighty to overcome serious burdens on the right to vote. The federal Equal Protection Clause calls for every burden on the right to vote to be “justified by relevant and legitimate state interests sufficiently weighty to justify the limitation.” *Crawford*, 128 S. Ct. at 1616 (lead opinion) (citation and internal quotation marks omitted). Although the lead opinion in *Crawford* found the State’s interest in combating voter fraud legitimate, it saw no need to closely scrutinize the weight of that interest because it declined to take judicial notice of the severe burdens the voter ID law imposes. See *id.* at 1635

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<sup>6</sup> According to the Transportation Security Administration (TSA), passengers must present “accepted forms of ID” if they wish to board a domestic flight without having to go through a more intensive, secondary security screening. Telephone Call placed to TSA General Inquiry Line (Menu Option: “For information on ID requirements”), at (866) 289-9673 (Nov. 3, 2009) (“TSA General Inquiry Line”); see *Gilmore v. Gonzales*, 435 F.3d 1125, 1129 (9th Cir. 2006). TSA describes the accepted forms of ID as follows: “Passengers must provide one form of photo identification issued by a local, state, or federal government agency, such as a passport, driver’s license, military ID or current student ID. Alternatively, a passenger may produce two forms of non-photo identification, one of which must have been issued by a state or federal agency, such as a birth certificate or Social Security card.” TSA General Inquiry Line, *supra*. Those rules, unlike the Indiana voter-ID requirements, encompass both non-photo IDs and photo IDs that contain no expiration date.

(Souter, J., joined by Ginsburg, J., dissenting) (“Because the lead opinion finds only ‘limited’ burdens on the right to vote . . . it avoids a hard look at the State’s claimed interests.”).

*Crawford* therefore does not foreclose a more rigorous assessment of the State’s interests. And the State’s interest is in fact minimal, both because of a lack of any evidence of in-person voter impersonation and because of the abundance of less restrictive alternatives to combating fraud.

1. As an abstract matter, there undoubtedly is a compelling governmental interest in limiting voter fraud. *See Crawford*, 128 S. Ct. at 1618-20 (lead opinion). But the “precise interest” advanced by the Indiana in support of the voter ID law, *Burdick v. Takushi*, 504 U.S. 428 (1992), is confined to addressing one distinct species of perceived fraud: in-person impersonation fraud, which would occur if an ineligible voter were able to cast a vote the polls by falsely claiming the name of a registered voter. *Id.* at 434. As the State has acknowledged, there are no reported incidents—not one—of impersonation fraud in the history of Indiana, let alone a prosecution for committing impersonation fraud. *See Crawford v. Marion County Election Bd.*, 472 F.3d 949, 955 (7th Cir. 2007) (Evans, J., dissenting).

Indiana’s voter ID requirements, in short, are a “solution” in search of a problem. Nor could the voter ID requirements be justified on the theory that, even if there has been no evidence of voter impersonation fraud to date, the State seeks proactively to prevent such fraud from arising in the future. In-person impersonation fraud not only is nonexistent as a matter of fact, it also is virtually inconceivable as a matter of theory.

To begin with, there is no serious possibility that an individual voter, acting alone, would commit impersonation fraud in an effort to alter an election by merely one vote. As to the possibility of a concerted scheme, because of the number of votes necessary to shift the outcome even in a very close election, effective vote fraud requires the ability to manipulate ballots en

masse (ideally after the polls have closed when the number of votes needed to affect the result becomes more apparent). That is why vote fraud typically involves schemes in which a few individuals can generate a substantial number of fraudulent votes in a short period of time, such as by stuffing the ballot box or by preparing and submitting fraudulent absentee ballots in bulk. *See* Craig C. Donsanto & Nancy L. Simmons, *Federal Prosecution of Election Crimes* 101 (7th ed. 2007), *available at* <http://www.usdoj.gov/criminal/pin/docs/electbook-0507.pdf>). Indiana's voter ID requirements do nothing to prevent those sorts of fraud—indeed, Indiana requires no form of ID documentation for absentee voting apart from a signature, even though the risk of impersonation fraud is far greater with absentee voting than with in-person voting. *See id.* at 31-32.

An orchestrated scheme of in-person impersonation fraud is essentially unimaginable, with or without a voter ID requirement. Such a scheme would require coordinating an army of individual impersonators in order to generate a meaningful number of votes, and each impersonator ostensibly would have to: (i) memorize the name and other identifying information of a registered voter; (ii) learn to mimic the voter's signature; (iii) travel to the appropriate polling precinct site for the particular voter; (iv) wait in line at the polling place to cast a ballot in that voter's name; (v) ensure that the registered voter has not already voted at the polls; and (vi) risk detection by a poll worker who may know the registered voter. Such a scheme would be manifestly unworkable and inefficient as compared with other forms of fraud, requiring an inordinate degree of coordination and effort for each additional vote. And the risks of detection would dwarf the risks associated with other types of vote fraud because of the number of individuals who necessarily would be party to the scheme.

2. Furthermore, as the experience in numerous other jurisdictions demonstrates, Indiana could readily achieve its objectives through a variety of less burdensome means. The majority of States do not require voters to produce documentary evidence of their identity at the polls. *See* Spencer Overton, *Voter Identification*, 105 Mich. L. Rev. 631, 640 (2007). Those States instead employ non-documentary means of assuring the voter's identity, such as by matching the voter's signature to the corresponding one in the registration rolls. *Id.* Several other States request documentary proof of ID, but permit a voter who fails to bring ID documentation to the polls to establish his identity by other means, such as by signing an affidavit. *Id.* at 640-641. A number of additional States allow non-photo ID documents such as a utility bill or bank statement. *Id.* at 641; *see also* Help America Vote Act of 2002, Pub. L. No. 107-252, § 303, 116 Stat. 1666, 1712 (codified at 42 U.S.C. § 15483(b)(2)(A)) (requiring first-time voters to present documentary proof of ID, including utility bills, bank statements, paychecks, and other forms of non-photo ID).

Six States require a voter, at least in the first instance, to produce a photo ID. In three of those States—Louisiana, Michigan, and South Dakota—a voter who does not own a qualifying photo ID nonetheless can vote upon executing an affidavit affirming his identity. *See* Br. for Petr., *Crawford v. Marion County Election Bd.*, No. 07-21, at 30-31 n.14. Florida also permits a voter who fails to possess a qualifying photo ID to cast a ballot, which will be counted if the State determines that his signature matches the signature on the voter's registration forms. *Id.* That leaves only two States—Indiana and Georgia—that enforce an absolute requirement to produce a qualifying photo ID. Georgia, however, accepts a broader range of photo IDs than



Indiana. *See Common Cause/Georgia v. Billups*, 504 F. Supp. 2d 1333, 1342, 1347-48 (N.D. Ga. 2007).<sup>7</sup>

Indiana could substantially reduce the burdens on voters by adopting less restrictive ID measures of the kind used by other States. That is particularly the case because Indiana already employs the less-restrictive means of a signature match with respect to absentee voting. *Crawford*, 128 S. Ct. at 1613 (lead opinion). And if a signature match suffices for absentee voting—where the risk of impersonation fraud is much higher—there could be no sound reason to require anything more burdensome for in-person voting at the polls. In the alternative, Indiana, like other States, could enable a voter who lacks a government-issued photo ID to execute an affidavit affirming his identity, with associated criminal penalties for falsely claiming the identity of another person. Those sorts of measures have proven more than adequate in other States to prevent in-person impersonation fraud.

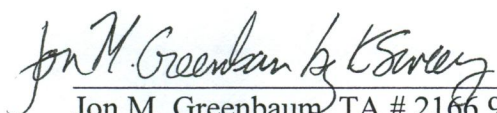
### CONCLUSION

*Crawford* was not, as the Secretary of State portrays it, a sweeping validation of Indiana's voter ID law; rather, it was a limited holding which left open the possibility of future facial challenges to the law, and openly invited as-applied challenges as well. Accordingly, whatever the merits of the Secretary's Petition, the decision in *Crawford* does not support his case—it weakens it.

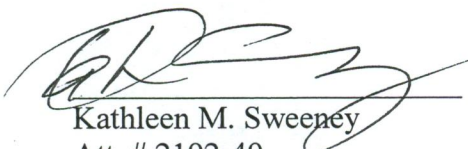
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<sup>7</sup> For example, a voter can obtain a voter ID card in Georgia by going to the registrar's office and providing identification. Ga. Code § 21-2-417.1(d)(1). Given that a voter's registration application is among the acceptable forms of identification that can be used to obtain a voter ID card, *see Common Cause*, 504 F. Supp. 2d at 1347, the Georgia law does not in fact prevent voter impersonation but merely raises an administrative hurdle for voters who lack a government-issued photo ID.

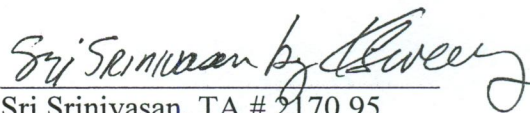
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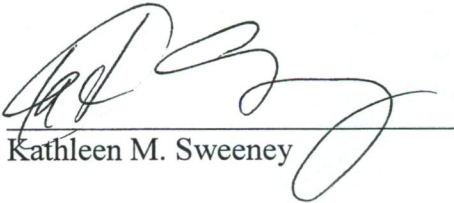


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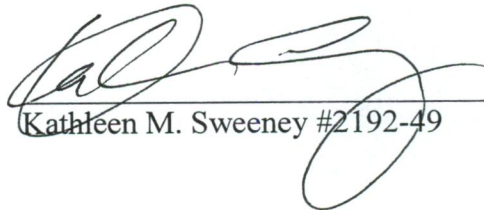
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