

COMMON PLEAS COURT
WARREN COUNTY OHIO
FILED

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IN THE COURT OF COMMON PLEAS
WARREN COUNTY, OHIO

JAMES L. SPAETH
CLERK OF COURTS

JENNIFER MILLER

[REDACTED]

And

KIMBERLY GRANT

[REDACTED]

Plaintiffs,

v.

ASSOCIATION OF COMMUNITY
ORGANIZATIONS FOR REFORM
NOW, AKA "ACORN"

*Serve: National Registered Agents, Inc.
145 Baker Street
Marion, Ohio 43302*

PROJECT VOTE/VOTING FOR
AMERICA, INC.

*Serve: National Registered Agents, Inc.
145 Baker Street
Marion, Ohio 43302*

Defendants

CASE NO. *OBCV 72630*

JUDGE *FLANNERY*

COMPLAINT

JURY DEMAND ENDORSED
HEREON

PARTIES

1. Plaintiffs Jennifer Miller and Kimberly Grant are residents and registered voters of Warren County, Ohio.
2. Plaintiffs have complied with state law and are both properly registered to vote in the upcoming November 4, 2008 Elections.

3. Plaintiffs will vote in the November 4, 2008 Elections.
4. Plaintiffs both voted in the 2004 and 2006 November Elections.
5. Plaintiffs are both very concerned that the elections-related fraud perpetrated by ACORN has diluted the value of their votes, and will continue to do so in the 2008 Elections and beyond.
6. Defendant Association of Community Organizations for Reform Now (hereinafter "ACORN") is, upon information and belief, a nonprofit corporation, incorporated in Arkansas, with its principle place of business in Washington, D.C/Louisiana, and registered with the state of Ohio as a non-profit corporation.
7. The license number issued to ACORN by the Secretary of State is No. 564765.
8. Defendant Project Vote/Voting for America, Inc. is registered with the Ohio Secretary of State as a foreign, non-profit corporation, license no. 1486192.
9. Defendant Project Vote is organized under the laws of Louisiana.
10. Project Vote/Voting for American, Inc. shares a statutory agent with ACORN, and for all intents and purposes, is indistinguishable from ACORN. Thus, unless specifically separated the term "ACORN" shall hereinafter include Project Vote/Voting for America, Inc.
11. ACORN's "voter-mobilization arm," Project Vote, regularly advises Ohio Secretary of State Jennifer Brunner on election strategy, even recently issuing a news release that claims credit for Brunner's directive restricting challenges to suspected fraudulent voter registrations.
12. According to Congressional testimony, while "ACORN says they don't take federal money," Acorn Housing Corporation receives millions of dollars from the federal government, and from 2004 to 2006, funneled 4.6 million to ACORN." ACORN is thus willfully using taxpayer funds to support fraudulent political operations.
13. According to Congressional testimony, "ACORN's massive enterprise includes as many as 150 subsidiary organizations, according to a recent legal filing by members of its board of directors. This list includes two affiliated labor union locals, TV and radio broadcast operations, immense housing counseling operations, and a number of lobbying and political entities. In all, ACORN's total operation this year has an estimated budget of \$110 million. * * * [T]hese organizations are operated as a single enterprise, which is controlled from the top down."
14. According to Congressional testimony "[ACORN's] practice of juggling funds and blame between entities has often created good deal of confusion as to which crimes are allegedly committed by ACORN and which activities are those of subsidiaries such as the "non-partisan" 501(c)(3) Project Vote and the political operative organization known as Citizen Services, Inc."

15. According to Congressional testimony, “evidence indicates that the non-profit organization known as Project Vote and the political operative organization known as Citizens Services Inc. are wholly owned subsidiaries of the ACORN web of organizations. There should be no distinction between crimes or alleged crimes perpetrated by personnel from Project Vote and those from ACORN.”
16. Citizen Services, Inc. is not registered in Ohio. Any reference to ACORN heretofore included any conduct of Citizen Services, Inc.
17. According to Congressional testimony, “[f]irsthand accounts from current and former ACORN employees, major news stories, and court cases across the country, expose corruption at every level of ACORN including embezzlement, cover-ups, misuse of taxpayer funds and voter fraud.”
18. Defendant is engaged in massive voter registration drives and political canvassing throughout the state of Ohio and the United States of America; some of this work is performed on behalf of current United States of America presidential candidate Barack Obama.
19. ACORN's political wing has endorsed Barack Obama for president, and during the primary season, the Obama camp paid Citizen Service Inc., \$832,598 for various political services according to Federal Elections Commission filings. Citizen Services, Inc. and ACORN share the same board of directors.
20. Defendant ACORN has engaged in aggressive fraudulent voter registration activity throughout Ohio and is likely to continue to do so through the November 4, 2008 Elections and beyond.
21. Pursuant to their election-related and political efforts, Defendant is engaged in massive fraudulent voter registration.
22. Every fraudulent registration is a potential illegal vote that dilutes the votes of Plaintiffs and others who have dutifully and lawfully complied with registration requirements, and are in fact eligible to vote.

JURISDICTION AND VENUE

23. This Court has subject matter jurisdiction pursuant to Article IV, Section 4(b) of the Ohio Constitution and R.C. 2923.34(B).
24. This Court has personal jurisdiction over the Defendant because it is either a resident of Ohio or has transacted business in Ohio out of which the claims asserted herein have arose.

25. Venue is proper in Warren County because Plaintiffs reside in Warren County and this is an action described in Civ. R. 4.3, as provided in Civ. R. 3(B)(7), as to Defendant, as required under Civ. R. 3(E) for venue over all parties and claims.

COUNT 1: VIOLATIONS OF THE OHIO CORRUPT ACTIVITY ACT

26. Plaintiffs hereby incorporate by reference the allegations contained in all paragraphs heretofore and above.
27. Defendant ACORN is a “person,” as that term is defined in R.C. 2923.31(G).
28. Defendant ACORN is an “Enterprise,” as that term is defined in R.C. 2923.31(C).
29. Beginning no later than 2003, and continuing until the present day, Defendant ACORN has engaged, by and through its agents, in a scheme to obtain, prepare and file fraudulent voter registrations throughout the state of Ohio by means of numerous violations of R.C. 2913.31(A)(1), R.C. 2913.31(A)(2), and R.C. 2913.31(A)(3) (“Forgery” and “Uttering Forged Documents”); R.C. 2913.42(A)(1) and R.C. 2913.42(A)(2) (“Tampering with Writings and Records” and “Uttering Tampered Writings or Records”) with a purpose to, or with reckless disregard as to whether it will, *inter alia*, injure or threaten to injure Plaintiffs and other similarly situated citizens by diluting and/or threatening to dilute their vote, by depriving or threatening to deprive them of their rights to participate in an honest and effective election process, by impairing and/or threatening to impair Plaintiffs’ rights to have government officials chosen and other ballot measures approved or disapproved by means of a fair and accurate election process.
30. In furtherance of this scheme, Defendant ACORN committed the predicate acts described in Paragraphs 34 through 73 of this Complaint.
31. All predicate acts were committed within the scope of the aforementioned scheme, and were explicitly or implicitly authorized by Defendant ACORN. Each predicate act is thus an act of Defendant ACORN.
32. Fraudulent voter registration in Ohio has reached epidemic proportions over the last several election cycles, with submission of fake names, forged signatutes, etc.
33. According to Congressional testimony, ACORN stands out for its pattern of voter registration fraud stretching back a decade. Rather than showing any signs of improvement, all signs point to increased lawbreaking.

(Predicate Acts in Ohio)

34. The Association of Community Organizations for Reform Now, or ACORN, has turned in at least 65,000 cards to the Cuyahoga County Board of Elections in the last year.
35. At an October 8, 2008 Cuyahoga County Board of Elections hearing related to ACORN voter fraud, two Ohio voters, including Christopher Barkley , claimed that they were

hounded by the community-activist group ACORN to register to vote several times, even though they made it clear they'd already signed up. Barkley estimated he'd registered to vote "10 to 15" times after canvassers for ACORN relentlessly pursued him and others. "I kept getting approached by folks who asked me to register," Barkley said. "They'd ask me if I was registered. I'd say yes, and they'd ask me to do it [register] again. Some of them were getting paid to collect names. That was their sob story, and I bought it," he said.

36. Another witness subpoenaed to testify at the same October 8, 2008 hearing, Lateala Goins, 21, stated "[y]ou can tell them you're registered as many times as you want - they do not care, ...they will follow you to the buses, they will follow you home, it does not matter." She added that she never put down an address on any of the registration forms, just her name.
37. ACORN admitted to the Cuyahoga County Board of Elections that the group engages in fraudulent voter registration activity.
38. Ohio ACORN officials "blamed the elections board for not scrutinizing ACORN's suspicious cards," claiming the group "can't be expected to catch everything."
39. Local representatives of the organization told Cuyahoga board members that they don't have the resources to identify fraudulent cards turned in by paid canvassers.
40. ACORN bribed and/or pressured Freddie Johnson of Cleveland to register to vote 72 times. Johnson filled out 72 separate voter-registration cards over an 18-month period at the behest of ACORN. Johnson stated "[s]ometimes, they come up and bribe me with a cigarette, or they'll give me a dollar to sign up, ...The ACORN people are everywhere, looking to sign people up. I tell them I am already registered. The girl said, 'You are?' I say, 'Yup,' and then they say, 'Can you just sign up again?'" He'd collected 10 to 20 cigarettes and anywhere from \$10 to \$15, he said.
41. In Columbus, Ohio, several Columbus citizens have acknowledged to reporter Shelby Holliday, on video tape, that ACORN's voter registration efforts include harassing and begging voters to register more than once, even when the voter tells the ACORN agent that he or she is already registered, and offering favors in exchange for voting.
42. In Greene County, Ohio ACORN's fraudulent registration efforts have induced involvement from the County Sheriff and Prosecutor.
43. On May 8, 2007, a Reynoldsburg, Ohio (Franklin County) man was indicted for voting twice in the November election. ... [An attorney] said the man, a Mr Gilbert was registered in both counties by ACORN, the Association of Community Organizations for Reform Now, a nonprofit agency that has come under fire in 12 states for voter fraud.

44. On or about September 19, 2006, the mother of a 16-year-old has told the Summit County elections board that her daughter was registered to vote, just two months after a 10-year-old boy was summoned for jury duty because he was on the county's voter rolls. The person who filed the voter registration application was Prentice McNary of Akron, a circulator paid by Association of Community Organizations for Reform Now, or ACORN, according to Board of Elections Director Bryan Williams.
45. On or about September 1, 2006, Franklin County Elections Board staffers questioned the validity of hundreds of names on registration forms and petitions for a proposed constitutional amendment to boost Ohio's minimum wage. Most of the disputed names came from lists provided by paid solicitors working for ACORN, the Association of Community Organizations for Reform Now.
46. On or about August 11, 2006, and according to Matt Damschroder, director of the Franklin County Board of Elections, 500 voter registration cards, all collected between March and July of 2006 by ACORN, were turned over to County Prosecutor Ron O'Brien to determine if a crime had been committed.
47. Between Fall 2003 and June 2004, ACORN submitted approximately 23,000 voter registration cards in Franklin County, Ohio. The Franklin County Board of Elections discovered that voter registration cards submitted by ACORN included cards for people who did not exist. Franklin County Board of Elections Director Matthew Damschroeder characterized many of the registrations as "blatantly false," while the manager of Franklin County Voter Services confirmed that the submission of false voter registration forms has resulted in the issuance of voter identification cards that could have been used, and can be used in the future, to cast fraudulent votes in the November 2004, November 2006, and November 2008 elections.
48. On or near June 3, 2004, two ACORN agents submitted fraudulent voter registration cards forms to the Franklin County Board of Elections.
49. On or about October 8, 2004 ACORN submitted 19 false voter registration cards to the Franklin County Board of Elections, including cards identifying people who did not exist.
50. On or about October 8, 2004 ACORN submitted 19 voter registrations to the Hamilton County Board of Elections for people who could not be located by the sheriff's department after similar handwriting and false addresses raised the suspicions of elections workers. These registration cards were fraudulent and contained forged signatures.
51. On or about September 7, 2004, ACORN employee and/or agent Kevin Eugene Dooley submitted a fraudulent voter registration card to the Franklin County Board of Elections that resulted in Mr. Dooley being charged with a felony offense for forging the voter registration card in question.

52. In September 22, 2004, the Ohio Bureau of Criminal Identification and Investigation confirmed that it was investigating over 800 fraudulent voter registration cards submitted in Summit County.
53. Numerous, perhaps thousands, of fraudulent voter registration cards have been submitted in Ohio by Defendant ACORN.

(Out-of-State Predicate Acts)

54. On October 7, 2008, Nevada state authorities representing the Nevada Secretary of State Nevada Attorney General seized records and computers from ACORN's Las Vegas office, after fielding complaints of voter fraud. Bob Walsh, spokesman for the Nevada secretary of state's office, told FOXNews.com the raid was prompted by ongoing complaints about "erroneous" registration information being submitted by the Association of Community Organizations for Reform Now, also called ACORN. The group was submitting the information through a voter sign-up drive known as Project Vote. "Some of them used nonexistent names, some of them used false addresses and some of them were duplicates of previously filed applications," Walsh said, describing the complaints, which largely came from the registrar in Clark County, Nevada. Secretary of State Ross Miller said the fraudulent registrations included forms for the starting lineup of the Dallas Cowboys football team. Mr. Miller likened ACORN to a "bank robber," while another Nevada official indicated that ACORN made a "pathetic attempt at quality control."
55. On or about October 3, 2008, in Crown Point Indiana, ACORN submitted a pile of suspected fraudulent voter registration applications to Lake County election officials, said. Lake County election workers discovered dozens of ACORN-delivered registration forms they believe contain inaccurate voter information, including one in which a dead man from Gary was listed as the applicant. None of those applications was processed. Of the 5,000 voter registrations, at least half have been found to be fraudulent, registered to dead people, or feature signatures that all look exactly the same. Sally Lasota, a member of the Democrat party, and Director of County Elections Board stated, with respect to ACORN's submission, "it is fraud," and further noted that, "due to the volume of ACORN submissions, it amounts to less time to review all registrations."
56. In 2003, ACORN employees in Missouri turned in more than a thousand suspicious voter registration cards, with one witness indicating that a card was turned in under the name of her infant.
57. Following Colorado's 2004 election, two ex-ACORN employees were convicted of perjury for submitting false voter registration forms; one ex-ACORN employee admitted to registering her friends 40 times.

58. In 2004, police arrested a former ACORN employee who had more than 300 completed voter registration cards in the trunk of his car, many of which had not been turned in within the legal time limit.
59. In 2005, Virginia authorities found that, of a sample of Project Vote-gathered registrations, 83% were rejected for using false or questionable information.
60. In 2007, King County, Washington officials announced the indictment of seven workers ACORN had hired to register voters, calling the episode the "worst case of voter registration fraud in the history of the state." At least three of those individuals have pleaded guilty and ACORN was forced to pay a \$25,000 settlement. King County concluded that it "may have valid administrative, civil, and criminal cause of actions against ACORN stemming from ACORN's actions during a voter registration operation in King County," but agreed to forebear from prosecution. The settlement agreement limited ACORN activities, and imposed management and quality control mandates on ACORN.
61. In 2006, ACORN also committed what Washington Secretary of State Sam Reed called the "worst case of election fraud" in the state's history. In the case, ACORN submitted just over 1,800 new voter registration forms, and all but six of the 1,800 names were fake.
62. In April 2008, federal prosecutors announced guilty pleas for federal election fraud by eight former ACORN employees in Missouri, based on their activities in the 2006 election. They submitted false addresses and names, as well as forged signatures. At least one former ACORN employee was sentenced to 15 months in prison.
63. In 2008 alone, ACORN's activities have prompted calls for investigations in nearly a dozen states: Louisiana, Pennsylvania, Connecticut, New Mexico, Texas, Nevada, Ohio, Wisconsin, Michigan and North Carolina, with new investigations developing regularly.
64. In June, 2008, the New York Times reported that Louisiana "Election officials have expressed concern that large numbers of people who believe they are registered will show up at the polls in November, only to find that they cannot vote because their application had been improperly submitted." An ACORN spokesman said that it's typical for 30 percent of their cards to be duplicates or incomplete. That is a troublingly high rate of error.
65. In July, 2008, Pennsylvania officials charged a former ACORN employee with 19 counts of perjury, making false statements, forgery and identity theft in connection with the voter registration forms in connection with more than 100 suspect cards.
66. In August, 2008, the Connecticut Post reported that state officials began asking for an investigation into ACORN's registration activities, in which there were errors in 20 percent of the thousands of registration forms the group turned in. Referencing the large amount of incomplete, incorrect, or improperly filed forms, one registrar said, "Some of

my staff has been here for 15 years and when they see ACORN come in, they start crying."

67. In August, 2008, ACORN was forced to announce that it would begin running background checks on its signature gatherers in New Mexico after it was learned that nine employees had felony criminal records ranging from forgery to identity theft to child rape. It is unclear how many of the thousands of voter registration cards containing personal information were handled by the nine felons. Bernalillo County officials are investigating 1,100 possibly fraudulent cards. In one case, a series of nine cards appear to have been filled out using the phone book. ACORN's voter registration fraud in New Mexico has been a recurring theme since 2003, including its 2004 attempt to register a 13-year-old boy.
68. In 2005 the organizations employees were accused of filing as many as 3,000 false signatures on a ballot initiative.
69. In Texas, where ACORN's affiliate, Citizens Services Inc., has provided contract work on behalf of Senator Barack Obama's presidential campaign, the Houston Chronicle reported on August 17, 2008 that "About 40 percent of the 27,000 registration cards gathered by ACORN from January through July have been rejected or placed in limbo pending the gathering of more information, according to the county" while "about 6,600 were filled out by people already registered, and many others contained insufficient information."
70. Nevada and federal officials announced in August that they would form a task force to aggressively pursue allegations of election fraud, with the Las Vegas Review-Journal specifically noting "Clark County officials have said they suspect fraud is occurring in the thousands of voter registrations being submitted by [ACORN]."
71. In Wisconsin, ACORN has allegedly offered to bribe citizens with pre-paid gasoline cards or restaurant gift cards to induce them to register. Further voter registration problems include apparently falsified drivers license numbers, Social Security numbers, and similar personal information. By the end of August, 2008, Milwaukee's Election Commission Executive Director had referred over 49 individuals to prosecutors for suspected voter registration fraud - of them, 37 were ACORN employees. An August 20 report from the Milwaukee Journal-Sentinel noted that of the 35 ACORN employees referred for investigation, seventeen apparently filled out voter applications and then signed the cards themselves. That involved two to four cards in each case; twelve submitted cards for individuals who later told ACORN they never filled out an application (that involved one card in each case); one submitted a card for a dead voter, which was the second such case; a Voters Project worker previously submitted a card for a deceased voter; one was apparently making up driver's license numbers for an unknown number of voters; one submitted about a half-dozen applications for already-registered voters; and one woman reportedly complained that a voter registration card was submitted for her husband, who had been dead for 10 years.
72. In Michigan, A Secretary of State spokesperson recently (Summer-Fall, 2008) said "There appears to be a sizeable number of duplicate and fraudulent applications ... and it

appears to be widespread." In Pontiac, Michigan, the clerk's office has found numerous applications filed for a given name. In Oak Park, Michigan, the clerk has been seeing "lots of duplication" from ACORN in recent months. Another official from the Michigan Secretary of State's office has acknowledged that because ACORN pays their workers per voter application collected, there is an incentive for fraud, and that ACORN tends to hold applications, many of which are false and duplicate, for months and dump them on our election officials at the registration deadline.

73. In September, 2008, Durham County, North Carolina's elections officials have asked for an investigation of dozens of cards submitted by ACORN. One was for a fourteen-year-old boy.

* * *

74. The predicate acts articulated heretofore in paragraphs 30 through 70 have constituted, do constitute, and/or would constitute violations of R.C. 2913.31(A)(1), (2), and/or (3); R.C. 2913.42(A)(1) and/or (2); R.C. 2913.31.
75. In addition to the offenses articulated in the prior paragraph, some of the predicate acts articulate above chronicle the bribing of citizens with gifts, property or anything of value is a fourth-degree felony in Ohio.
76. It is a fifth-degree felony for a person to pay "compensation on a fee-per-registration" system when signing up someone to vote.
77. The Predicate Acts described above constitute a "pattern of corrupt activity," as that term is defined in R.C. 2923.31(E), given that they have the same or similar purposes, results, participants and methods of commission and are otherwise interrelated and are not isolated events.
78. The Predicate Acts described above have occurred with considerable frequency over the last five years, and constitute the regular way by which Defendant ACORN conducts its business or operations.
79. Defendant ACORN is still engaged in, as it is continuously engaged in, conduct similar or tantamount to the predicate acts articulated above and heretofore.
80. Given this lengthy and ubiquitous history of voter fraud, embezzlement, and misuses of taxpayer funds, ACORN's pattern of fraud can no longer be dismissed, as ACORN has previously characterized it, as a series of "unfortunate events."
81. ACORN itself, and not just its agents, is responsible for the perpetration of the predicate acts articulated heretofore, in that it either acted with intent to cause these acts, or with negligence or reckless indifference as to whether these acts occurred.
82. Given its hiring, training, and compensation practices, ACORN knew or should have known that its conduct would cause fraud, and knows or should know that its conduct will cause fraud in the future.

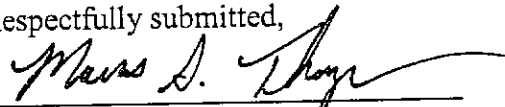
83. In 2008, ACORN has engaged in this pattern of corrupt activity in Ohio with full knowledge that Secretary of State Jennifer Brunner is pursuing a policy of refusing to cross-check new voter registrations to an outside, independent database in order to verify the identity of the voter.
84. ACORN has engaged in this pattern of corrupt activity with full knowledge that, due to Ohio laws and policies, there is limited opportunity to withhold, from elections boards, fraudulent registrations that have been gathered.
85. ACORN has engaged in this pattern of corrupt activity with full knowledge that fraudulent registrations submitted by ACORN are given to county boards of elections, put into their database, which is then uploaded to the official Statewide Voter Registration Database, and that thereafter the Ohio Secretary of State has offered no effective means of accessing and reviewing mismatches.
86. Brunner's aforementioned policies enhance the likelihood that, due to ACORN's pattern of corrupt activity fraudulent votes will be case in the 2008 elections.
87. Given the size of ACORN's efforts and the fact that the abuses appear to be systemic, it is likely that fraudulent registrations have not been discovered, and will lead to fraudulent votes.
88. Fraudulent voting, whether from deceased individuals and felons, or through the casting of multiple votes, has occurred in the past, and such fraudulent votes have been counted
89. Defendant ACORN's continued participation in the electoral process poses a perpetual and continuous threat to the voting rights of Plaintiffs and similarly-situated citizens.
90. By means of the pattern of corrupt activity described heretofore, Defendant ACORN has injured and/or threatens to injure the Plaintiffs and similarly-situated citizens by diluting and/or threatening to dilute their vote, depriving them or threatening to deprive them of their right to participate in an honest and fair electoral process, impairing or threatening to impair the Plaintiffs' right to have government officials chosen and ballot measures approved or disapproved by means of a fair and accurate election process.
91. The casting of even one fraudulent vote dilutes the votes of Ms. Miller, Ms. Grant, and others, both in Ohio and nationwide, and is unlawful, and the use of government funds to accomplish this end is further unlawful.
92. This dilution is capable of repetition in any future election.
93. As recent election results demonstrate, just few votes can alter the outcome of an election, the course of our state and nation, and the course of history.

WHEREFORE, Plaintiffs hereby demand judgment as follows:

- (1) The dissolution of Defendant ACORN, pursuant to R.C. 2923.34(C)(3).

- (2) The revocation of any license or permit that allows Defendant ACORN to carry on its business in the State of Ohio, pursuant to R.C. 2923.34(C)(4).
- (3) The imposition of restrictions upon Defendant ACORN's future political and elections-related activities, including restrictions that prohibit the Defendants from engaging in the same type of activity that has produced the pattern of corrupt activity articulated in this Complaint, pursuant to R.C. 2923.34(C)(2).
- (4) The imposition of a restriction prohibiting ACORN from circumventing such a court order through the use of third-party operations or sham organizations.
- (5) The awarding of attorneys fees to Plaintiffs, pursuant to R.C. 2923.34(G).
- (6) The awarding such other and further relief as the court shall deem just and equitable.

Respectfully submitted,

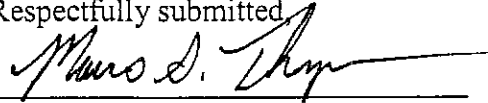


Maurice A. Thompson (0078548)
1851 Center for Constitutional Law
Buckeye Institute for Public Policy Solutions
88 E. Broad, Suite 1120
Columbus, Ohio 43215
Tel: (614) 224-4422
Fax: (614) 224 4644
Email: mthompson@buckeyeinstitute.org

JURY DEMAND

Plaintiffs hereby demand trial by jury in this action.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Maurice A. Thompson", written over a horizontal line.

Maurice A. Thompson (0078548)
1851 Center for Constitutional Law
Buckeye Institute for Public Policy Solutions
88 E. Broad, Suite 1120
Columbus, Ohio 43215
Tel: (614) 224-4422
Fax: (614) 224 4644
Email: mthompson@buckeyeinstitute.org