

1 Daniel Pochoda (Bar No. 021979)
2 Kelly J. Flood (Bar No. 019772)
3 James Duff Lyall (Bar No. 330045)*
4 **ACLU FOUNDATION OF ARIZONA**
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11 *Admitted pursuant to Ariz. Sup. Ct. R. 38(f)
12 *Attorneys for Plaintiffs*

9 UNITED STATES DISTRICT COURT
10 DISTRICT OF ARIZONA

12 Arizona Dream Act Coalition, et al.,
13 Plaintiffs,
14 vs.
15 Brewer, et al.,
16 Defendants.

No. 2:12-cv-02546-DGC

**DECLARATION OF
DANIEL POCHODA**

17
18 I, Daniel Pochoda, hereby declare:

19 I make the statements in this Declaration based on my own personal knowledge,
20 except as to any statements which are identified as being made on information and belief,
21 and if called to testify I could and would do so competently as follows:

22
23 1. I am a lawyer with the American Civil Liberties Union of Arizona and counsel for
24 Plaintiffs in this matter.
25
26
27
28

1 2. On September 19, 2012, my office served a public records request pursuant to
2 A.R.S. 39-121, *et seq*, on the Arizona Department of Transportation (“ADOT”). A true
3 and correct copy of the request is attached hereto as Exhibit A.
4

5 3. On October 10, 2012, I received a letter, dated October 3, 2012, from ADOT
6 acknowledging receipt of the above request and stating that the agency has begun to gather
7 all responsive records. A true and correct copy of the letter is attached hereto as Exhibit B.
8 Along with the letter, ADOT produced a CD, containing responsive records. Enclosed
9 within this production are the following documents: Attached hereto as Exhibit C is a true
10 and correct copy of the ADOT/MVD document titled, “Primary and Secondary Forms of
11 Acceptable Documentation,” which was revised Nov. 30, 2010. Attached hereto as Exhibit
12 D is a copy of the ADOT MVD Policy 16.1.4(s), titled “Establishing Authorized
13 Presence,” which was revised September 18, 2012. Attached hereto as Exhibit E is a true
14 and correct copy of the ADOT/MVD document, titled “Primary and Secondary Forms of
15 Acceptable Documentation,” which was revised in September 18, 2012. Attached hereto
16 as Exhibit F is a copy of the ADOT/MVD document, titled, “Authorized Presence
17 Document/License Expiration Date for a Type F Credential,” which was revised
18 September 18, 2012.
19
20
21

22 4. On November 8, 2012, I received a letter from ADOT, dated October 24, 2012,
23 along with production of records, which included a CD containing spreadsheets showing
24 the documentation presented by noncitizen applicants to obtain either an Arizona driver’s
25 license or identification card from January 30, 2005 to the date of production. Attached
26 hereto as Exhibit G is the letter, dated October 24, 2012, and excerpts of spreadsheets,
27
28

1 which list applicants who submitted an employment authorization document as proof of
2 authorized presence in the United States. Between 2005 and 2012, applicants used an
3 EAD as proof of authorized presence an estimated 47,568 times. According to ADOT,
4 some applicants are likely represented multiple times on the spreadsheet, depending on
5 when their Arizona credential expired or their immigration documents needed to be
6 updated.
7

8 5. The American Civil Liberties Union of Arizona paid for and received the records
9 we marked for copying.
10

11 6. All of the documents attached as Exhibits C through G are true and correct copies
12 of records we received in response to our public records request

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I hereby declare that the foregoing is true and accurate under penalty of perjury pursuant to the laws of Arizona and the United States.

DATED this 12th day of DECEMBER, 2012

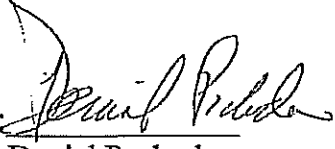
By: 
Daniel Pochoda

EXHIBIT A

ALESSANDRA SOLER MEETZE
EXECUTIVE DIRECTOR

ROBERTO REVELES
PRESIDENT



Sent Via Certified Mail

September 19, 2012

Arizona Department of Transportation
Risk Management Office
1324 North 22nd Avenue
Phoenix, AZ 85009

AMERICAN CIVIL
LIBERTIES UNION
FOUNDATION
OF ARIZONA
P.O. BOX 17148
PHOENIX, AZ 85011
P/602.650.1854
F/602.650.1376
WWW.ACLUAZ.ORG

Dear Public Records Request Administrator:

Pursuant to Arizona's Public Records Law, Ariz. Rev. Stat. § 39-121 *et seq.*, the ACLU of Arizona and ACLU Immigrants' Rights Project (collectively, the "ACLU") request the right to examine and copy, or to be furnished with copies of, certain public records in the possession of the Arizona Department of Transportation, Motor Vehicles Department.

Arizona Public Records Law sets forth a presumption that all records are "open to the public for inspection as public records." *Carlson v. Pima County*, 141 Ariz. 487, 490, 687 P.2d 1242 (1984). If the request is denied in part or in whole, please justify any redactions by referencing the specific grounds on which information is withheld under the Public Records Law. All segregable portions of otherwise exempt materials must be produced. We reserve the right to appeal your decision to withhold any information.

The ACLU is a non-profit civil rights organization, and these records are not sought for any commercial purpose. Rather, these records will inform the ACLU's investigation of Arizona Executive Order 2012-6, which purports to "re-affirm[]" that noncitizens granted deferred action are ineligible for driver's licenses and nonoperating identification licenses under Arizona law. *See* Janice Brewer, Gov. of Ariz., Re-Affirming Intent of Arizona Law In Response to the Federal Government's Deferred Action Program, EO 2012-6, Aug. 15, 2012.

If feasible, we request the records in electronic format (via email or CD). However, we agree to reimburse you for reasonable costs associated with the production of the requested information. Ariz. Rev. Stat. § 39-121.01(D)(1); cf. Ariz. Rev. Stat. § 39-121.03 (fees associated with locating documents permissible only for commercial requests). If that amount will exceed \$50, please inform me of the amount requested for reimbursement *before you incur the costs*. We also reserve the right to designate some or all of the records for copying after onsite inspection.

We seek the following records, in written, electronic, audio, video, CD-ROM or other format:

1. Any policies or instructions in effect *prior* to August 15, 2012 or reports concerning verification that an applicant for a driver's license or nonoperating identification license is a person whose "presence in the United States is authorized under federal law." Ariz. Rev. Stat. § 28-3153(D).

2. Any policies or instructions in effect *after* August 15, 2012 or reports concerning the verification that an applicant for a driver's license or nonoperating identification license is a person whose "presence in the United States is authorized under federal law." Ariz. Rev. Stat. § 28-3153(D).

3. Any policies or instructions in effect *prior* to August 15, 2012 or reports concerning the denial of a driver license, instruction permit, or nonoperating identification license to a person who has been deported, and the reinstatement of that person's privilege to apply for a driver license, permit, or nonoperating identification license once his legal presence status is restored. See Ariz. Rev. Stat. §§ 28-3158(G), 28-3165(G).

4. Any policies or instructions in effect *after* August 15, 2012 or reports concerning the denial of a driver license, instruction permit, or nonoperating identification license to a person who has been deported, and the reinstatement of that person's privilege to apply for a driver license, permit, or nonoperating identification license once the person's legal presence status is restored. See Ariz. Rev. Stat. §§ 28-3158(G), 28-3165(G).

5. Any policies or instructions in effect *prior* to August 15, 2012 or reports concerning individuals who are unable to provide a Social Security number in an application for an Arizona driver license or an instruction permit as required by Ariz. Rev. Stat. § 28-3158(D)(5).

6. Any policies, reports, critiques, records, logs, reviews, evaluations, documents, instructions, notes, memoranda, messages, emails, or other communications regarding the implementation of Arizona Executive Order 2012-6.

7. From 1996 to the present, the annual number of noncitizens in deferred action status whom were granted an Arizona driver's license or a nonoperating identification license.

8. From August 15, 2012 to the present, the number of noncitizens in deferred action status who were denied an Arizona driver's license or nonoperating identification license due to their inability to establish that their "presence in the United States is authorized under federal law." Ariz. Rev. Stat. § 28-3153(D).

9. From 1996 to the present, the annual number of noncitizens who applied for an Arizona driver's license or nonoperating identification license; established that their presence was authorized in the United States based on an

employment authorization document (EAD); and were granted an Arizona driver's license or nonoperating identification license, and the subsection of federal law under which employment was authorized, as indicated by the code entered under the "Category" heading of the EAD.

10. From 1996 to the present, the annual number of noncitizens who applied for an Arizona driver's license or nonoperating identification license; established that their presence was authorized in the United States based on a: Foreign Passport with a US visa, Visa Waiver I-94W, or Admission Stamp; and were granted an Arizona driver's license or nonoperating identification license.

11. From 1996 to the present, the annual number of Arizona driver's licenses issued to temporary residents.

12. From 1996 to the present, the annual number of Arizona driver's licenses, identification cards, and motorcycle endorsements issued with a foreign/non-resident credential type.

13. From 1996 to the present, the annual number of noncitizens who applied for an Arizona driver license or instruction permit who did not provide a Social Security number.

14. From 1996 to the present, the annual number of noncitizens who were granted an Arizona driver license or instruction permit who did not provide a Social Security number.

15. Any reports, records, spreadsheets, or documents indicating the total cost and cost per applicant of processing an application for an Arizona driver's license or nonoperating identification license and the way in which those costs were paid for in FY 2010, 2011, and 2012.

16. Any reports, records, spreadsheets, or documents indicating the total cost and cost per applicant of providing an Arizona driver's license or nonoperating identification license to applicants with deferred action status; applicants who prove their presence in the country is authorized based on EAD; or applicants who lack a Social Security number, and the way in which those costs were paid for in FY 2010, 2011, and 2012.

17. Any reports, records, spreadsheets, or documents indicating annual gross and net revenues to the Arizona Department of Transportation, in total and for each individual, from all fees assessed to Arizona drivers in FY 2010, 2011, and 2012, including but not limited to any driver's license and nonoperating identification license application fees; vehicle registration fees; vehicle inspection fees; and fees for emissions testing.

18. Any reports, records, spreadsheets, or documents reporting the number of uninsured motorists in Arizona from 1996 to the present.

19. Any reports, records, spreadsheets, or documents reporting the estimated premium costs associated with uninsured motorist coverage for Arizona drivers from 1996 to the present.

20. Any reports, records, spreadsheets, or documents estimating the impact of increases or reductions in the number of insured and uninsured drivers on premium costs associated with uninsured motorist coverage for Arizona drivers from 1996 to the present.

21. Any reports, records, spreadsheets, or documents reporting the economic costs to Arizona of motor vehicle accidents associated with uninsured motorists from 1996 to the present.

You may contact us when the records have been compiled, or if there are ways we can narrow the request to expedite processing. However, if we do not hear from you within twenty-one (21) days, we will deem the request denied. See Ariz. Rev. Stat. § 39-121(D)(1) and (E) (public records must be furnished “promptly”); see also *Phoenix New Times L.L.C. v. Arpaio*, 217 Ariz. 533, 538, 177 P.3d 275, 280 (Ct. App. 2008) (“[T]o the extent the party does not receive a prompt response, ‘[a]ccess to a public record is deemed denied.’”).

AMERICAN CIVIL
LIBERTIES UNION FOUNDATION
OF ARIZONA

Thank you for your prompt attention. If you have any questions or concerns, please feel free to contact me at (602) 773-6003 or via email dpochoda@acluaz.org.

Sincerely,



Dan Pochoda
Legal Director

Copy to:

John Halikowski
Director
Arizona Department of Transportation
206 South 17th Avenue, Mail Drop 100A
Phoenix, AZ 85007

EXHIBIT B



**Arizona Department of Transportation
Transportation Services Group**

206 South Seventeenth Avenue Phoenix, Arizona 85007-3213

Janice K. Brewer
Governor

John S. Halikowski
Director

ADOT Office of Safety and Risk Management
ORG 1300 MD 030P 602.712.7327 Fax 602.712.6545
1324 N. 22nd Ave., Phoenix 85009-3715

John A. Bogert
*Chief of
Operations*

October 3, 2012

*Advance copy (without enclosures) sent via email to dpochoda@aclu.org

OCT 10 2012

Mr. Dan Pochoda, Legal Director
American Civil Liberties Union Foundation of Arizona
P. O. Box 17148
Phoenix, AZ 85011

Dear Mr. Pochoda:

Your September 19, 2012 public records request directed to the Arizona Department of Transportation and its Motor Vehicle Division ("ADOT/MVD") has been received by this office as custodian of records for the Department. Enclosed with our initial acknowledgment is a CD-ROM containing all of the policies and related forms and instructions in ADOT/MVD's possession that are responsive to Item Nos. 1 through 6 of your request.

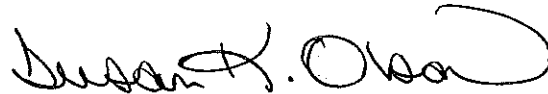
As you will see, the CD is divided into two folders labeled as Pre-August 15, 2012 (for Item Nos. 1 and 3) and Post-August 15, 2012 (for Item Nos. 2, 4 and 6). The subject of Social Security Numbers, in particular, is addressed in MVD Policy # 2.1.8; page 3, paragraphs O & P of Policy # 16.1.4; and the last column of the agency's thirty-page "Customer Characteristics-USCIS Matrix" (in the Post-August 15, 2012 folder). Additionally, please note that those documents relevant to your inquiry which did not change as a result of the Governor's Executive Order 2012-6 have been included in *both* folders.

With respect to the remainder of your request (Item Nos. 7 through 21 as well as the emails and other communications you requested in Item No. 6), please be advised that ADOT/MVD has already begun to identify, gather and organize all of its responsive records, and we anticipate that this Department-wide process will be completed within the next two to four weeks.

Should you have any questions, or if you decide to narrow the scope of your public record request in order to further expedite our response time, please feel free to contact me. Otherwise, I will be in touch as soon as the remaining documents are available.

Response to ACLU Public Records Request
October 3, 2012
Page Two

Very truly yours,

A handwritten signature in black ink, appearing to read "Susan K. Olson". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Susan K. Olson
Custodian of Records

Enclosures



Janice K. Brewer
Governor

John S. Halikowski
Director

Arizona Department of Transportation Administrative Services Group

John Nichols
Director

October 3, 2012

Dan Pochoda
ACLU
P. O. Box 17148
Phoenix, Az 85011

OCT 10 2012

Re: Public Information Request

INVOICE

<u>Quantity</u>	<u>Description</u>	<u>Unit \$</u>	<u>Extended</u>
1	CD/DVD	\$15.00	\$15.00
1	Postage		\$.70
		TOTAL	\$15.70

Please return a copy of this invoice with your payment made payable to ADOT. Payments are to be mailed to:

ADOT Safety and Risk Management
1324 N. 22nd Avenue
Phoenix, AZ 85009

EXHIBIT C

Primary and Secondary Forms of Acceptable Documentation

This is to provide the guidelines for acceptable forms of documentation, which are presented for the issuance of a driver license, commercial driver license, instruction permit or identification card license in accordance with MVD Policy 16.1.2 Acceptable Documentation for Driver License, Commercial Driver License, Instruction Permit and Identification License Transactions.

Rev 11/30/10

Primary Forms of Acceptable Documentation

Driver License or Instruction Permit issued by any state, territory or possession of the U.S. ⁽¹⁾, except a license issued by a state under A.R.S. § 28-3153 that does not verify lawful presence in the U.S. under federal law.

The states that do not verify lawful presence are: Illinois, New Mexico, Utah and Washington ⁽²⁾.

⁽¹⁾ U.S. territories and possessions include:

- American Samoa
- Federated States of Micronesia
- Guam
- Marshall Islands
- Northern Marianas
- Palau
- Puerto Rico
- Virgin Islands

⁽²⁾ Exception - Washington verifies only for credentials labeled as "Enhanced"

Enhanced Driver License or Enhanced Identification Card issued by any state, territory or possession of the U.S.

Birth Certificate issued by any state, territory or possession of the U.S.

- Hospital records/certificates and the California Certified Abstract of Birth are not accepted for proof of name, DOB, or authorized presence
- Arizona Certificate of Birth (Foreign Born) is not accepted for proof of authorized presence, but is accepted for proof of name and DOB

Delayed Birth Certificate issued by any state, territory or possession of the U.S

U.S. Certificate of Birth Abroad

U.S. Passport or U.S. Passport Card

Foreign Passport with U.S. Visa or Visa waiver I-94W (Green) or Admission Stamp *

- Admission stamp or I-94 required in passport
Additional Documentation may be required for some classifications (See Customer Characteristics - USCIS Class Matrix)
 - Classifications C-1, C1-D, C-2, C-3, D-1 and D-2 are not eligible for a DL, CDL, ID and/or IP
- *Classifications WT and WB are eligible for an ID only

I-94 Form presented without Passport

- May contain a photo – If not, I-94 must be accompanied by other acceptable photo ID including but not limited to an Arizona Refugee Medical Assistance Card issued by the AZ Dept. of Economic Security, Refugee Medical Assistance Program

U.S. Permanent Resident Card / Resident Alien Card (I-551)

United States Citizenship Immigration Services (USCIS) Employment Authorization Card (I-688A, I-688B, I-766)

United States Citizenship Immigration Services (USCIS) Refugee Travel Document I-571

U.S. Certificate of Naturalization
U.S. Certificate of Citizenship
Arizona Identification Card
Tribal Certificate of Indian Blood
Tribal or Bureau of Indian Affairs Affidavit of Birth
U.S. Military DD-214
U.S. Military ID Card (active duty, reserve and retired)
Record of a previous Arizona Driver License, Identification Card or Instruction Permit
Affidavit of Identification with photo and within 15 days of issuance from the AZ Dept. of Corrections or the Maricopa County Adult Probation Department See MVD Policy 16.1.2)
Released Offender ID Card (See MVD Policy 16.1.2) issued by either:
<ul style="list-style-type: none"> • AZ Dept. of Corrections, or • Maricopa County Sheriff's Office (ALPHA Program/re-entry ID Card)
Secondary Means of Acceptable Documentation
Driver License, Identification Card or Instruction permit issued by any state, territory or possession of the U.S.
Arizona Certificate of Birth (Foreign Born), issued by the Office of Vital Records
U.S. Military Dependent ID Card
U.S. Armed Forces Driver License
U.S. Department of Veterans Affairs Card
U.S. Department of Justice Inmate ID Card
U.S. Social Security Card
Motor Vehicle Record or Clearance Letter (within 30 days of issue)
Legal Guardian Certificate
Selective Service Card
W-2 Form
Concealed Weapons Permit
Medical Insurance ID Card (includes Arizona AHCCCS ID Card)
Professional License
Bank Card
Credit Card
Employee ID Badge (with photo)
School ID (with photo)
Marriage Certificate issued by any state, territory or possession of the U.S.
Certified Letter of Identification for a Ward of the Court, issued by a court or government agency in the U.S.
Document from a court of record such as :
<ul style="list-style-type: none"> • Adoption Decree • Bankruptcy Decree • Divorce Decree • Emancipation Decree • Legal Guardian Decree • Name Change Decree

EXHIBIT D



ESTABLISHING AUTHORIZED PRESENCE

Summary of Changes

Policy Sections A, B, O and S were revised.

Purpose

To provide guidelines for the Customer Service Representative (CSR) to use when establishing authorized presence and, when applicable, issuing a Type F (limited) license.

Policy

- A. Arizona Revised Statutes (A.R.S.) § 28-3153(D) provides that the Motor Vehicle Division (MVD) shall not issue to or renew a driver license or nonoperating identification license for a person who does not submit proof satisfactory to MVD that the applicant's presence in the United States is authorized under federal law. MVD is required to determine that each applicant meets the requirements of the law.
 - B. MVD reserves the right to review, consider and request additional information and documentation in making determinations regarding authorized presence.
 - C. The CSR shall ensure that the customer meets authorized presence requirements (when applicable) and that the documentation presented is genuine and in proper form.
 - D. The customer must present proof of authorized presence when applying for:
 - An original Arizona license
 - The renewal of a limited Arizona license
 - The renewal of an extended Arizona license when there is no database record showing the customer's previous establishment of authorized presence
 - The reinstatement of any license
- Exception: An individual who wishes to reinstate his or her driving privilege only (person is not applying for an Arizona license, either original or renewal) is not required to provide proof of authorized presence and would pay reinstatement fees only.
- E. A database record of an extended Arizona driver license, commercial driver license, identification license, or instruction permit is acceptable proof of authorized presence.
 - F. Authorized presence requirements *do not apply* to the following transactions:
 - Requests for a duplicate or update of any license, regardless of the license issue date
 - Renewal of an extended license, under the circumstances provided in Section D, above
 - Title and/or registration transactions
 - G. To prove authorized presence, the customer must present at least one primary form of identification, see Policy 16.1.2 Acceptable Documentation. All documents must be in

ESTABLISHING AUTHORIZED PRESENCE

Page 2 of 4

English and either an original or copy certified by the issuing agency. Depending on the primary form of identification presented, additional documentation may be required.

- H. A foreign passport (must be accompanied by a valid I-94 or an admissions stamp), Canadian driver license or Canadian birth certificate may be accepted as proof of the customer's authorized presence in the U.S. However, any other document issued by a foreign government (or agency) shall not be accepted for the purpose of proving authorized presence.
- I. A limited (Type F) license is issued to a customer who is applying for an identification license or Class D, G, or M driver license (or instruction permit) and whose period of authorized presence is for a limited period of time; as determined by the primary form of identification and any supporting documentation that is presented at the time of application, see the Authorized Presence Document/License Expiration Date Chart and/or Customer Characteristics-USCIS Class Matrix.
- J. Prior to the issuance of a Type F license, the customer must meet all applicable eligibility and identity requirements, see the appropriate Driver and Identification License Issuance Screening policies.
- K. Pursuant to A.R.S. § 28-3002, a customer requesting an original (or renewing a) license must pay the applicable license fee, see Policy 16.1.6 Driver and Identification License Fees.
- L. Prior to the issuance of the Type F license, Customer Service supervisors or their designees shall verify and approve the customer's documentation. This includes documentation for Type F customers that present a verifiable Social Security Number/Card with their foreign documents. The CSR shall photocopy all approved source documents presented for the purpose of establishing name, date of birth, and authorized presence. The photocopied source documents, once processed (reviewed, verified, and accepted), are filmed to serve as evidence of the public filing of the licensing transaction, see Policy 5.1.3 Film Imaging Preparation
 - 1. This does not apply to Type F duplicates/updates that do not require proof of authorized presence.
 - 2. The Technical Support Unit cannot verify or approve authorized presence documentation, or issue a Type F license.
 - 3. Authorized Third Party Providers are not authorized to issue Type F licenses.
- M. The Type F license expiration date shall coincide with the customer's assigned authorized presence expiration date (as shown on the primary form of identification or supporting documentation (e.g., I-20, I-797, DS-2019, etc.), unless an indefinite status or duration of status (D/S) has been granted.

Note: To determine the license expiration date when the authorized presence documentation does not display a specific expiration date or simply states D/S, see the Authorized Presence Document/License Expiration Date Chart and/or Customer Characteristics-USCIS Class Matrix.

- N. Prior to the Customer Service supervisor or their designees issuing the Type F license (delivering to camera), the CSR shall enter the applicable Customer Characteristic onto the Customer Record. Once added to the Customer Record the characteristic remains valid until expired. Customer Service supervisors and their designees are authorized to delete a

ESTABLISHING AUTHORIZED PRESENCE

Page 3 of 4

characteristic that was entered in error. When a characteristic cannot be deleted, the supervisor or designee will “expire” the characteristic and enter an explanation in the Customer Characteristic transaction comment section.

- O. Except as provided in Section S, upon application for a Type F license, a customer who presents a USCIS Employment Authorization Card (I-688B or I-766) must also provide his or her Social Security Number (SSN), see Policy 2.1.8 Social Security Online Verification (SSOLV). The Customer Characteristics-USCIS Class Matrix provides information on additional Type F customers required to provide a SSN.
- P. A Type F licensee, who is requesting that the name on his or her license be changed, must first change his or her name with the Social Security Administration, as applicable, before applying for the new license, see Policy 16.1.3 Establishing Name and Date of Birth.
- Q. Pursuant to A.R.S. § 28-3153, the CSR may issue a temporary Type F license (Class D, G, or M) pending verification of the customer’s lawful presence in the U.S. To be eligible, the customer must submit a valid Notice of Action, form I-797, or other acceptable immigration or citizenship document and a fee of \$10. The temporary license:
- Is a hard copy license
 - Is valid for a maximum duration of 1 year at a time

Exception: With the approval of the Director’s designee, alternative methods of status verification, including consultation with USCIS, may be used to issue a temporary Type F license.

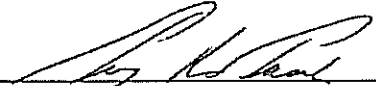
- R. USCIS may assign a classification or status that prohibits the issuance of an Arizona license, see the Customer Characteristics-USCIS Class Matrix for information in regards to the various USCIS classification statuses and the Division’s established expiration dates. A customer whose authorized presence document indicates any one of the following USCIS classification statuses is not eligible for any class or type Arizona license:
- C-1 Alien in transit directly through U.S.
 - C-1D Combined Transit and Crewman VISA
 - C-2 Alien in transit to UN headquarters
 - C-3 Foreign government official, members of immediate family, attendant, servant, or personal employee in transit
 - D-1 Crewmember departing on same vessel of arrival
 - D-2 Crewmember departing by means other than vessel of arrival
- S. A customer presenting a USCIS Employment Authorization Document (I-688A, I-688B, I-766) resulting from a Deferred Action Childhood Arrival is not acceptable.
- T. The Division will not issue a license or permit (extended, limited, or temporary) when the customer presents documentation (may include a license) that does not appear to be legitimate or acceptable. CSRs, Customer Service supervisors, or designees shall follow the instructions provided in Policy 18.2.6 Suspected Fraudulent Identity and/or Documentation when they suspect that the customer may not be the person identified by the documentation or the documentation does not appear to be legitimate.

ESTABLISHING AUTHORIZED PRESENCE

Page 4 of 4

U. The U.S. Department of State Diplomatic Motor Vehicles Division has the sole authority to issue driver licenses, vehicle registrations, and titles for foreign missions and foreign mission members. States may not issue, and foreign mission or mission members may not legally apply for or receive a state driver license, motor vehicle title, registration and license plate in violation of limitations and conditions imposed by the Department of State, (this does not include Honorary Consuls). Visit the Department of State's Diplomatic Motor Vehicles Division website at www.state.gov/ofm/dmv/.

17 September 2012
Date


STACEY K. STANTON
Division Director

Authority: USC 8, A.R.S. §§ 28-3002, 28-3153, 28-3157, 28-3158, 28-3164, 28-3165, R17-4-409 and Executive Order 2012-06

Procedure/Steps: Screening, Customer Characteristics, Customer Characteristics (MDCHAR)

EXHIBIT E

Primary and Secondary Forms of Acceptable Documentation

This is to provide the guidelines for acceptable forms of documentation, which are presented for the issuance of a driver license, instruction permit or identification card license in accordance with MVD Policy 16.1.2 Acceptable Documentation for Driver License, Instruction Permit and Identification License Transactions.

Rev 09/18/12

PRIMARY (must include Date of Birth)	SECONDARY (does not have to include Date of Birth)
Enhanced Driver License or Enhanced ID Card issued by another state in the US	Driver License, ID Card or Instruction Permit issued by any state, territory or possession of the US
Birth Certificate issued by any state, territory or possession of the US (Hospital records/certificates and California Certified Abstracts of Birth are not acceptable)	Arizona Certificate of Birth (Foreign Born)
Delayed Birth Certificate issued by any state, territory or possession of the US	Social Security Card
US Certificate of Birth Abroad	US Military Dependent ID Card
US Passport or Passport Card	US Armed Forces Driver License
Arizona ID Card	US Department of Veterans Affairs Card
Tribal Certificate of Indian Blood	US Department of Justice Inmate ID Card
Tribal or Bureau of Indian Affairs Affidavit of Birth	Motor Vehicle Record or Clearance Letter (within 30 days of issue)
Foreign Passport with US Visa or Visa Waiver I-94W (Green) or Admission Stamp (classes WB & WT eligible for ID card only)	Legal Guardian Certificate
I-94 Form presented without passport. If without photo, must also provide other acceptable form of state ID	Selective Service Card
Permanent Resident Card/Resident Alien Card, I-551	W-2 Form
USCIS Employment Authorization Document (I-688A, I-688B, I-766) - An Employment Authorization Document resulting from a Deferred Action Childhood Arrival is not acceptable	Concealed Weapons Permit
Refugee Travel Document I-571	Medical Insurance ID Card (including AHCCCS ID card)
US Certificate of Naturalization	Professional License
US Certificate of Citizenship	Bank Card
US Military DD-214	Credit Card
US Military ID Card (active duty, reserve and retired)	Employee ID Badge (with photo)
Record of a previous Arizona Driver License, ID Card or Instruction Permit	School ID (with photo)
Affidavit of Identification (with photo and within 15 days of issue) from Arizona Department of Corrections	Marriage Certificate issued by any state, territory or possession of the US
Released Offender ID (with photo) from Arizona Department of Corrections	Certified Letter of Identification for a Ward of the Court, issued by a court or government agency in the US
ALPHA Program/Community Re-Entry ID from the Maricopa County Sheriff's Office	Decrees from Court of Record •Adoption •Bankruptcy •Divorce •Emancipation •Legal •Guardian •Name Change
Affidavit of Identification (with photo and within 15 days of issue) from the Maricopa County Adult Probation Department	

MVD reserves the right to review, consider and request additional information and documentation in making determinations regarding age, identity and authorized presence.

EXHIBIT F

AUTHORIZED PRESENCE DOCUMENT/LICENSE EXPIRATION DATE FOR A TYPE F CREDENTIAL

Revised 09/18/2012

Document Name	Type F	Extended (E) Limited (L)	Comments	Expiration Date*
B1 Visa (Temp Business Visitor), B2 Visa (Temp Pleasure Visitor), Border Crossing Card (B1/B2 Visa/BCC)	Yes	L	Must be accompanied by a valid I-94	End of Stay (EOS) date on I-94 (Maximum 6 months programmed – escalate for exceptions of more than 6 months)
Canadian Passport, Driver License or Birth Certificate	Yes	L	Canadian Visitors	Temporary Visitors (does not include Canadians with a valid US Visa/I-94 in their Passport) <ul style="list-style-type: none"> • Maximum 6 months (can be less at customer's request) • From the date of application • Renewable for periods of 6 months or less • Unlimited number of renewals • Must expire before being renewed
Certificate of Citizenship/Naturalization	No	E	Proof of US Citizenship; also need SS# and/or card	Driver license: Customer's 65th birthday, after which the license is renewable for periods of five years Identification License: Indefinite
Employment Authorization Card (EAC) (I-688B and I-766)	Yes	L	When the customer has 'Asylee' or 'Refugee' status, an I-94 with an employment authorization stamp may be accepted in lieu of the I-688B or I-766 card Exception: An Employment Authorization Document resulting from a Deferred Action Childhood Arrival is not acceptable.	EAC: Expiration date listed on card Asylee/Refugee I-94: 5 years from US entry/order date, then indefinite 1 year renewals until status changes
Foreign Passport	Yes	L	Must be accompanied by a valid I-94 <ul style="list-style-type: none"> • I-94 may be stapled to, or stamped directly onto, a page in the foreign passport or an admissions stamp • Middle Eastern countries may issue passports with individual photos or a group family photo • The group family photo is usually included in the mother's passport • Both the individual and the group family photo are acceptable, however each individual must present his/her own I-94 	EOS date on the Visa admissions stamp, I-94, or when D/S is present, the expiration date established for assigned USCIS classification <ul style="list-style-type: none"> • WB (Business) or WT (Tourist) are eligible for an identification license only • Asylee and Refugee: AP is 5 years from US entry/order date, then indefinite 1 year renewals until status changes • Parolee: Documents presented indicating parole must be read carefully to determine length of stay. If the document indicates 'indefinite' parole, AP is 5 years from US entry/order date, then indefinite 1 year renewals until status changes

I-20 (Certificate of Eligibility for Nonimmigrant (F-1) Student)	Yes	L	<p>Must also present a passport with an admissions stamp or an I-94</p> <ul style="list-style-type: none"> I-20 must be validated by the school in which the customer is enrolled (e.g., school stamp on I-20, class enrollment schedule, etc.) School must be located in AZ or have AZ location verification letter 	+ 60 days past the date on which the student's enrollment period ends unless customer has approved OPT (Optional Practical Training)
DS-2019 (Certificate for Eligibility for Exchange Visitor (J-1) Status)	Yes	L	<p>Must also present a passport with an admissions stamp or I-94</p> <ul style="list-style-type: none"> DS-2019 must be validated by the Program Responsible Officer or Alternate If there is not a local Arizona 'US Address' for the customer, the customer <u>may</u> need to provide an "official" letter from the sponsor explaining the discrepancy 	+30 days past the date on which the program exchange visitor's enrollment period ends
I-797A	Yes	L		EOS date on I-94 (included on I-797A)
I-797B or C	Yes	L	<p>Must include a 'Receipt Number', 'Case Type' and 'Notice Type'. Receipt Number must have thirteen characters and begin with a</p> <ul style="list-style-type: none"> WAC (Western Service Center), EAC (Eastern Service Center), LIN (Lincoln Service Center), MSC (Missouri Service Center), or SRC (Southern Service Center) <p>Exception: Receipt Numbers containing a 'Z' are generally for asylum applicants and information is not available using the USCIS website Case Status Check feature – Escalate for assistance, if required</p>	<p>Same as the date that the specific processing time comes to an end, from the 'Notice Date' listed on the I-797</p> <p>Example: Processing time will take "400 to 450 days"; license will expire 450 days from the 'Notice Date'. When a specific processing time is not given, allow 1 year from the 'Notice Date'</p> <p>Exception: Case Type I-130 is not acceptable</p>
I-94 "Arrival/Departure Record" (WHITE)	Yes	L	<p>Issued upon admittance to US. Bottom portion "generally" stapled to a passport page; explains how long the bearer may remain in the US & terms of admission. <u>May</u> be issued w/out passport; <u>May</u> contain a photo but "generally" only if customer paroled into the US or new immigrant waiting for permanent resident card (temp I-551). No photo I-94 w/out passport ok if accompanied by other acceptable photo ID including but not limited to Arizona Refugee Medical Assistance Card (issued by the Dept of Economic Security-ARMA Program) – I-94s are offered by the US in multiple languages - Additional I-94 types listed below:</p>	<p>EOS date on I-94, or when D/S is present, the expiration date established for the USCIS visa class.</p> <p>Exception: Visa class WB (Business) or WT (Tourist) eligible for an ID only for a maximum 90 days from entry (See I-94W GREEN below).</p> <p>Exception: Visa class C-1, C-1D, C-2, C-3, D-1, D-2 not eligible for a credential.</p> <p>Exception: "Indefinite" Asylee/ Parolee/ Refugee status <u>may</u> be issued 5-years from date of entry on I-94, after which the license is renewable for unlimited 1-year periods until status changes.</p>

I-94W Visa Waiver "Arrival/Departure Record" (GREEN) or Admission Stamp	Yes	L	Allows citizens of certain selected countries, traveling temporarily to the US under the nonimmigrant admission classes for visitors for pleasure or business, to enter the US without obtaining a nonimmigrant visa. Admission is for no more than 90 days.	Visa class WB (Business) or WT (Tourist) eligible for an ID only for a maximum 90 days from entry (see I-94 "Arrival/Departure Record" (WHITE) expiration date comments above)
I-94A "Arrival/Departure Record"	Yes	L	Many ports along the land borders with Canada & Mexico began issuing a modified Form CBP I-94A in late 2004. This form is computer generated, with both the bearer's personal information and terms of admission printed on the form instead of written by hand.	(see I-94 "Arrival/Departure Record" (WHITE) expiration date comments above)
I-94 "Corrected" "Arrival/Departure Record"	Yes	L	"Corrected" I-94s are issued by CBP to replace an I-94 that was issued with incorrect information. Look for the following when issued out of the Phoenix DHS Office: BLACK INK: the pre-printed I-94 number will be crossed out and the original I-94 number handwritten into the blank boxes on the form. Also in BLACK INK , the following is handwritten: "Corrected I-94; Admitted; (Original admission date); (Original visa class); Until (original until date)". RED INK: example: "Pho. Feb 20, 2007 2017" means the CBP Inspector is stationed in Phoenix, the date the corrected I-94 was created is 02202007; the Inspector's admission stamp # is 2017.	(see I-94 "Arrival/Departure Record" (WHITE) expiration date comments above)
I-94 "Replacement" "Arrival/Departure Record"	Yes	L	"Replacement" I-94s are issued two ways, one of which is by CBP to "replace" lost or mutilated I-94s. Under certain circumstances (determined by DHS not MVD), the CBP Inspector at the Phoenix DHS Office may issue a "replacement" I-94 that looks similar to the "corrected" I-94s described above. Only available for determination Tue-Wed-Thu from 7 am to 2 pm. When CBP is unable to issue a replacement, the customer needs to file Form I-102 Application for Replacement/Initial Nonimmigrant Arrival/Departure Document (Also see I-94 on I-797 for I-102 replacement info)	(see I-94 "Arrival/Departure Record" (WHITE) expiration date comments above)

I-94 w/RFID chip "Arrival/Departure Record"	Yes	L	RFID = Radio Frequency Identification // Pilot program using RFID chip imbedded in the paper stock of both the I-94 (white) & I-94W (green)	(see I-94 "Arrival/Departure Record" (WHITE) expiration date comments above)
I-94 on I797 "Arrival/Departure Record"	Yes	L	When a customer files an I-102 Application for Replacement/Initial I-94 or an application to extend (I-129, I-539, etc), upon approval, a new I-94 is issued as part of the I-797 Notice of Action "Approval Notice". Initial replacements will contain a date of initial entry; extended stay replacements will have new valid from & thru dates to replace expiring I-94s.	(see I-94 "Arrival/Departure Record" (WHITE) expiration date comments above)
Judicial Recommendation Against Deportation (JRAD)	Yes	L	Requires administrative approval prior to the issuance of a license - Use proper escalation processes for assistance	As directed
North Atlantic Treaty Organization (NATO) Military personnel (and their family members)	Yes	L	Must present a valid passport & official military orders or a letter signed by the Base Commander or his/her designee. May be accompanied by an I-94 (not required as NATO personnel are processed in a special military line @ airports). Participating NATO countries include Belgium, Canada, Denmark, Germany, Greece, Italy, the Netherlands, Norway, Portugal, Turkey, the United Kingdom, and the United States	EOS date listed on the official military orders or I-94 (if presented), or when D/S is present on I-94, the expiration date established for assigned USCIS classification or as listed on the official military orders
Notice of Hearing in Removal Proceedings	Yes	L	Requires administrative approval prior to the issuance of a license- Use proper escalation processes for assistance	As directed
Order of the Immigration Judge (OEIR)	Yes	L	Requires administrative approval prior to the issuance of a license- Use proper escalation processes for assistance	As directed
Permanent Resident Card (PRC) Resident Alien Card (I-551)	Yes	L	PRCs expired over one year MAY be accepted as all other documents are unless they are questionable. PRCs expired over two years can be re-verified with DHS to ensure the customer is still a valid Permanent Resident by following the 'Escalation Process' for your office.	PRC with a future expiration date: • Issue through future expiration date PRC with a past expiration date: • Issue in 1 year increments from the past expiration date until the customer provides a new PRC PRC with no expiration date: • Issue in 10 year increments from ADM/ADJ date I-797 Notice of Action indicating a new card has been applied for (Case Type I-90): • Issue in 1 year increments until th new PRC is received

EXHIBIT G



Arizona Department of Transportation
Transportation Services Group

206 South Seventeenth Avenue Phoenix, Arizona 85007-3213

Janice K. Brewer
Governor

John S. Halikowski
Director

ADOT Office of Safety and Risk Management
ORG 1300 MD 030P 602.712.7327 Fax 602.712.6545
1324 N. 22nd Ave., Phoenix 85009-3715

John A. Bogert
Chief of
Operations

October 24, 2012

NOV 08 2012

Mr. Dan Pochoda, Legal Director
American Civil Liberties Union Foundation of Arizona
P. O. Box 17148
Phoenix, AZ 85011

Dear Mr. Pochoda:

To follow-up on my initial letter and production of records on October 3, 2012, I can now provide you with the enclosed CD-ROM containing all of the records in ADOT/MVD's possession that are responsive to Item Nos. 9, 10, 11, 12, 14 and 17 of your public records request dated September 19, 2012. Please be aware that ADOT/MVD has no records of the type described in Item Nos. 7, 8, 13, 15 and 16, as well as Nos. 18 through 21 of your request.

With respect to Item Nos. 9 and 10, ADOT/MVD neither maintains nor possesses the requested annual totals of the number of Arizona driver licenses and identification cards issued to non-U.S. citizens. Nevertheless, the Department was able (through special programming) to extract some related data from its computer system in order to produce a report which is at least partially responsive to this portion of your request, and that report is set forth in the Excel spreadsheet you will find in the CD's third file folder. This spreadsheet shows, in date order, the documentation presented by non-citizen applicants to obtain either a driver license or ID-card from ADOT/MVD since *January 30, 2005*, which is as far back as such data exists. Please refer to the "USCIS Customer Class Matrix" reproduced in the second file folder for a complete description of each of the immigration or "INS" classes mentioned in the spreadsheet. No other codes of the nature referred to in Item No. 9 of your request are entered or kept by ADOT/MVD. And it is also important for you to keep in mind that the same license or ID-card applicants are likely to be represented multiple times on this spreadsheet, depending on when their Arizona credential expired and/or their immigration documents needed to be updated.

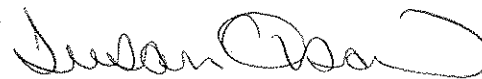
The last five folders on the enclosed CD are in response to Item Nos. 11, 12, 14 and 17 of your request, and are appropriately labeled as such (a copy of MVD Policy # 11.1.3 is included at the beginning of the CD in order to provide you with a description of the different vehicle registration category codes that the Division utilizes). With regard to Item No. 17, ADOT/MVD

Supplemental Response to ACLU Public Records Request
October 24, 2012
Page Two

does not have any fiscal reports which provide a breakdown of fees by individual customer.

As you may recall, on October 3, the Department previously gave you a CD containing all of the agency policies and related documents that were responsive to Item Nos. 1 through 6 of your request. ADOT/MVD is nearly completed with its process of gathering the emails, notes and other communications you requested in Item No. 6 as well. Therefore, I expect to be able to send these remaining records to you (or have them available for inspection if that is your preference) within the next ten to fourteen days. If you have any questions in the meantime, please let me know.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Susan Olson", written in black ink.

Susan K. Olson
ADOT Custodian of Records

Enclosures (including invoice)



Janice K. Brewer
Governor

John S. Halikowski
Director

Arizona Department of Transportation Administrative Services Group

John Nichols
Director

October 24, 2012

NOV 08 2012

Dan Pochoda
ACLU
P. O. Box 17148
Phoenix, Az 85011

Re: Public Information Request

INVOICE

<u>Quantity</u>	<u>Description</u>	<u>Unit \$</u>	<u>Extended</u>
1	CD/DVD	\$15.00	\$15.00
1	Postage		\$.70
		TOTAL	\$15.70

Please return a copy of this invoice with your payment made payable to ADOT. Payments are to be mailed to:

ADOT Safety and Risk Management
1324 N. 22nd Avenue
Phoenix, AZ 85009

Total Applicants Who Used EAD As Proof of Authorized Presence

2005	8694
2006	7408
2007	1447
2008	7410
2009	7636
2010	7859
2011	7080
2012	34

Total 2005-2012 47568

Form Type	Issue Date	Form	INS Code
	6/14/2005	1765	EAC
	6/15/2005	1765	EAC
	8/20/2005	1-776	EAC
	2/3/2005	AMPLY AUTH	EAC
	2/3/2005	AUTH EMP	EAC
	2/11/2005	AUTH PRES	EAC
	5/26/2005	EAD	EAC
	7/25/2005	EAD	EAC
	4/6/2005	EAP	EAC
	6/8/2005	EAP	EAC
	3/1/2005	EMP OUTHZ	EAC
	7/21/2005	EMPL OUTHO	EAC
	7/21/2005	I166B	EAC
	7/11/2005	I-677	EAC
	8/11/2005	I761	EAC
	3/11/2005	I765	EAC
	3/14/2005	I765	EAC
	4/22/2005	I765	EAC
	7/8/2005	I765	EAC
	8/2/2005	I765	EAC
	10/17/2005	I765	EAC
	10/21/2005	I765	EAC
	10/27/2005	I765	EAC
	11/26/2005	I765	EAC
	12/5/2005	I765	EAC
	2/23/2005	I-765	EAC
	3/9/2005	I-765	EAC
	4/5/2005	I-765	EAC
	6/4/2005	I-765	EAC
	8/12/2005	I-765	EAC
	9/6/2005	I-765	EAC
	9/29/2005	I-765	EAC
	11/1/2005	I-765	EAC
	11/2/2005	I-765	EAC
	11/17/2005	I-765	EAC
	11/30/2005	I-765	EAC
	12/22/2005	I-765	EAC
	3/12/2005	I767	EAC
	10/17/2005	I-767	EAC
	10/18/2005	I77	EAC
	11/17/2005	I77	EAC
	6/25/2005	I-771	EAC
	8/19/2005	I-7766	EAC
	5/24/2005	I786B	EAC
	10/14/2005	I788	EAC
	11/3/2005	I-796	EAC
	6/20/2005	I799	EAC
	7/11/2005	I799	EAC
	11/1/2005	I799	EAC
	2/23/2005	I-799	EAC

Total	
2005	8694

10/24/2005	I-799	EAC
9/22/2005	I-I-688B	EAC
2/28/2005	L688B	EAC
11/5/2005	T766	EAC
1/30/2005	EAC I668B	EAC
3/9/2005	EAC I-688B	EAC
2/8/2005	I0688B	EAC
7/5/2005	I668	EAC
3/3/2005	I-668	EAC
12/2/2005	I-668	EAC
2/9/2005	I668B	EAC
2/16/2005	I668B	EAC
3/1/2005	I668B	EAC
3/18/2005	I668B	EAC
3/25/2005	I668B	EAC
3/28/2005	I668B	EAC
5/27/2005	I668B	EAC
6/20/2005	I668B	EAC
6/20/2005	I668B	EAC
7/5/2005	I668B	EAC
7/5/2005	I668B	EAC
8/10/2005	I668B	EAC
8/23/2005	I668B	EAC
2/1/2005	I-668B	EAC
2/1/2005	I-668B	EAC
2/23/2005	I-668B	EAC
3/8/2005	I-668B	EAC
3/12/2005	I-668B	EAC
4/14/2005	I-668B	EAC
5/11/2005	I-668B	EAC
7/5/2005	I-668B	EAC
7/26/2005	I-668B	EAC
7/31/2005	I-668B	EAC
8/17/2005	I-668B	EAC
8/30/2005	I-668B	EAC
10/26/2005	I-668B	EAC
11/15/2005	I-668B	EAC
11/22/2005	I-668B	EAC
6/27/2005	I668N	EAC
9/21/2005	I-655B	EAC
8/24/2005	I666B	EAC
8/24/2005	I666B	EAC
2/12/2005	I688	EAC
2/22/2005	I688	EAC
2/22/2005	I688	EAC
2/23/2005	I688	EAC
2/23/2005	I688	EAC
3/29/2005	I688	EAC
4/8/2005	I688	EAC
4/20/2005	I688	EAC
4/20/2005	I688	EAC

5/4/2005 I688	EAC
5/10/2005 I688	EAC
6/22/2005 I688	EAC
7/1/2005 I688	EAC
7/21/2005 I688	EAC
7/26/2005 I688	EAC
8/20/2005 I688	EAC
9/8/2005 I688	EAC
9/13/2005 I688	EAC
9/24/2005 I688	EAC
9/27/2005 I688	EAC
10/4/2005 I688	EAC
10/13/2005 I688	EAC
10/22/2005 I688	EAC
10/31/2005 I688	EAC
12/6/2005 I688	EAC
12/27/2005 I688	EAC
3/18/2005 I-688	EAC
4/1/2005 I-688	EAC
4/1/2005 I-688	EAC
4/20/2005 I-688	EAC
7/20/2005 I-688	EAC
8/19/2005 I-688	EAC
8/26/2005 I-688	EAC
11/22/2005 I-688	EAC
11/29/2005 I-688	EAC
12/6/2005 I-688	EAC
12/9/2005 I-688	EAC
5/27/2005 I6888	EAC
5/20/2005 I-6888	EAC
8/29/2005 I6888B	EAC
2/8/2005 I-6888B	EAC
2/9/2005 I-6888B	EAC
2/3/2005 I688A	EAC
2/4/2005 I688A	EAC
7/28/2005 I688A	EAC
9/29/2005 I688A	EAC
10/5/2005 I688A	EAC
1/30/2005 I688B	EAC
1/31/2005 I688B	EAC
1/31/2005 I688B	EAC
1/31/2005 I688B	EAC
2/1/2005 I688B	EAC
2/1/2005 I688B	EAC
2/1/2005 I688B	EAC
2/3/2005 I688B	EAC
2/3/2005 I688B	EAC
2/3/2005 I688B	EAC
2/3/2005 I688B	EAC
2/4/2005 I688B	EAC
2/4/2005 I688B	EAC
2/4/2005 I688B	EAC

I-688:

2/4/2005 I688B	EAC
2/5/2005 I688B	EAC
2/5/2005 I688B	EAC
2/7/2005 I688B	EAC
2/7/2005 I688B	EAC
2/7/2005 I688B	EAC
2/8/2005 I688B	EAC
2/8/2005 I688B	EAC
2/8/2005 I688B	EAC
2/9/2005 I688B	EAC
2/9/2005 I688B	EAC
2/10/2005 I688B	EAC
2/11/2005 I688B	EAC
2/11/2005 I688B	EAC
2/11/2005 I688B	EAC
2/12/2005 I688B	EAC
2/12/2005 I688B	EAC
2/14/2005 I688B	EAC
2/15/2005 I688B	EAC
2/15/2005 I688B	EAC
2/16/2005 I688B	EAC
2/16/2005 I688B	EAC
2/16/2005 I688B	EAC
2/16/2005 I688B	EAC
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2/17/2005 I688B	EAC
2/17/2005 I688B	EAC
2/18/2005 I688B	EAC
2/18/2005 I688B	EAC
2/22/2005 I688B	EAC
2/22/2005 I688B	EAC
2/22/2005 I688B	EAC
2/22/2005 I688B	EAC
2/23/2005 I688B	EAC
2/23/2005 I688B	EAC
2/24/2005 I688B	EAC
2/24/2005 I688B	EAC
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2/24/2005 I688B	EAC
2/24/2005 I688B	EAC
2/25/2005 I688B	EAC
2/26/2005 I688B	EAC
2/28/2005 I688B	EAC
2/28/2005 I688B	EAC
3/1/2005 I688B	EAC
3/2/2005 I688B	EAC
3/3/2005 I688B	EAC
3/3/2005 I688B	EAC
3/5/2005 I688B	EAC
3/7/2005 I688B	EAC
3/8/2005 I688B	EAC

3/8/2005 I688B	EAC
3/8/2005 I688B	EAC
3/9/2005 I688B	EAC
3/9/2005 I688B	EAC
3/9/2005 I688B	EAC
3/9/2005 I688B	EAC
3/10/2005 I688B	EAC
3/10/2005 I688B	EAC
3/11/2005 I688B	EAC
3/11/2005 I688B	EAC
3/11/2005 I688B	EAC
3/11/2005 I688B	EAC
3/15/2005 I688B	EAC
3/15/2005 I688B	EAC
3/15/2005 I688B	EAC
3/15/2005 I688B	EAC
3/16/2005 I688B	EAC
3/16/2005 I688B	EAC
3/17/2005 I688B	EAC
3/17/2005 I688B	EAC
3/17/2005 I688B	EAC
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3/18/2005 I688B	EAC
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3/18/2005 I688B	EAC
3/19/2005 I688B	EAC
3/21/2005 I688B	EAC
3/22/2005 I688B	EAC
3/22/2005 I688B	EAC
3/22/2005 I688B	EAC
3/22/2005 I688B	EAC
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3/22/2005 I688B	EAC
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3/23/2005 I688B	EAC
3/23/2005 I688B	EAC
3/23/2005 I688B	EAC
3/23/2005 I688B	EAC
3/23/2005 I688B	EAC
3/24/2005 I688B	EAC
3/25/2005 I688B	EAC
3/28/2005 I688B	EAC
3/28/2005 I688B	EAC
3/29/2005 I688B	EAC
3/29/2005 I688B	EAC
3/30/2005 I688B	EAC
3/30/2005 I688B	EAC
3/31/2005 I688B	EAC
3/31/2005 I688B	EAC

3/31/2005 I688B	EAC
4/3/2005 I688B	EAC
4/3/2005 I688B	EAC
4/4/2005 I688B	EAC
4/4/2005 I688B	EAC
4/5/2005 I688B	EAC
4/6/2005 I688B	EAC
4/6/2005 I688B	EAC
4/7/2005 I688B	EAC
4/7/2005 I688B	EAC
4/8/2005 I688B	EAC
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