

# HARMON, CURRAN, SPIELBERG & EISENBERG, LLP

1726 M Street, NW, Suite 600 Washington, DC 20036

OFFICE: (202) 328-3500 (202) 328-6918 fax  
COUNSEL

2006 NOV 24 A 9 13

November 17, 2006

Lawrence Norton, Esq.  
Office of the General Counsel  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

**Re: MUR 5820**

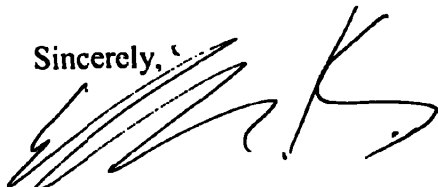
**Association of Community Organizations for Reform Now and Project  
Vote/Voting for America**

Dear Mr. Norton:

Enclosed please find the signed Declaration of Robert Lelievre. We intended for this Declaration to be included in Association of Community Organizations for Reform Now and Project Vote/Voting for America's response to the complaint filed in MUR 5820. Unfortunately, we received it after filing the response on November 16, 2006. Thus, we request that this document be added to the response and duly considered in the Federal Election Commission's review of MUR 5820.

Please contact me if you have any questions or concerns. I can be reached at (202) 328-3500.

Sincerely,



Elizabeth Kingsley

28044184997

## Declaration of Robert Lelievre

I, Robert Lelievre, being of legal age and sound mind, do hereby depose and state as follows:

1. My company, Lelievre Information Services, developed the computer application that generated the walk lists used by ACORN in Florida in 2004.
2. I used voter data provided by the State of Florida as the basis of the information used in the walk lists.
3. I used the whole list and did not screen out any voters based on party affiliation.
4. ACORN specifically asked me to exclude party information fields from information that would be printed on the walk list.
5. I specifically turned on the mask on the field that contained party identification on the walk list. The walk list used by ACORN did not contain any party identification information.
6. Without that information, people using the lists generated by my application would not have been able to identify whether a person on the list was in a party or, if they were, which party.
7. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

*Robert Lelievre*

Robert Lelievre

*11/14/2006*

Date

28044184998