

The Honorable Brian P. Kemp
Secretary of State
Elections Division
2 Martin Luther King, Jr., Drive
1104 West Tower
Atlanta, Georgia 30334-1530

May 29, 2012

DELIVERED BY HAND, FASCIMILE, AND REGULAR U.S. MAIL

RE: Complaint Challenging the Qualifications of Vernon Jones for Election to the Georgia House of Representatives from District 94

Dear Secretary Kemp:

My name is _____. I am an elector registered to vote Georgia House of Representatives district 94. My address is _____. I reside and am registered to vote at this address.

Pursuant to *O.C.G.A. § 21-2-5(b)*, I hereby challenge the qualifications of Vernon Jones to seek and hold the office of state Representatives from the 94th district.

On information and belief, and in support of this challenge to Mr. Jones' qualifications, I respectfully show as follows:

- (1) On Friday, May 25, 2012, Vernon Jones had his name placed on the July 31st General Primary ballot for state Representative from the 94th district;
- (2) Records on file with the Office of the Secretary of State of Georgia indicate that Vernon Jones is registered to vote at 5560 Mayfair Crossing Drive, Lithonia, Georgia, 30038 (*See Attachment A*);
- (3) Records on file with the Office of the Secretary of State of Georgia indicate that Vernon Jones cast a ballot in the March 6, 2012 Presidential Preference Primary using the address described in Paragraph (2) as his address for voting purposes (*See Attachment A*);
- (4) Records on file with the Office of the Secretary of State of Georgia indicate that the address Vernon Jones used as his address for voting purposes is not part of the territory embraced within the 94th state House district (*Attachment A*); and
- (5) Such additional evidence as may be shown at the hearing of this case.

**RE: Complaint Challenging
the Qualifications of Vernon Jones**

It therefore appears that Vernon Jones does not meet the constitutional and statutory requirements for seeking and holding the office of state Representative from the 94th district because:

- (a) Vernon Jones is not a resident of the district he seeks to represent, as required by *O.C.G.A. § 28-2-1(b)*; and
- (b) Vernon Jones will not have been a legal resident of the territory embraced within the 94th state House district for at least one (1) year immediately preceding the date of his election, November 6, 2012, as required by Article III, Section II, Paragraph III(b) of the Constitution of the State of Georgia and by *O.C.G.A. § 28-2-1(b)*.

Accordingly, I challenge Vernon Jones' qualifications to seek and hold the office of state Representative from the 94th district on each of these two separate grounds. I respectfully request that you notify Vernon Jones of this challenge and that you are requesting a hearing before a judge of the Office of State Administrative Hearings.

Sincerely,

ATTACHMENT A

Welcome To MVP
My Voter Page

Voter Information	Your Polling Place for State & County Elections
VERNON ANGUS JONES 5560 MAYFAIR CROSSING DR LITHONIA, GA 30038 Race: B Gender: M Status: ACTIVE Registration Date: 09/13/1984 Click here to change your address	Precinct FA FAIRINGTON ELEMENTARY SCHOOL 5505 PHILLIP BRADLEY DR LITHONIA, GA 30038 Click here for map & directions to polling place <small>NOTE: Non-specific rural addresses may not be available (Maps courtesy of MapQuest. The Secretary of State's Office is not responsible for inaccurate mapping and directions. Please contact MapQuest regarding erroneous information.)</small> Election Day precinct hours are 7:00 am - 7:00 pm
<p align="center">Absentee Ballot Request Information</p> <p align="center">Click here for early voting locations and times</p>	
Election Date: 03/06/2012 Election Type: PRESIDENTIAL PRIMARY/SPECIAL ELECTION	Absentee Request Received: 02/29/2012 Absentee Ballot Issued: 02/29/2012 Absentee Ballot Received: 02/29/2012
<p align="center">Your Sample Ballot(s)</p> <p>NOTE: The sample ballot shown below is for the next scheduled election in which you are eligible to vote. The date of the election is shown on the ballot.</p> <p>MUNICIPAL BALLOT INFORMATION: Sample ballots may include municipal election information when it is on a combined county ballot. If you do not see your municipal ballot information in the link provided, you will need to contact the municipality directly.</p> <p>Sample ballots are provided as a public service. While we make every effort to ensure accuracy, we cannot guarantee that sample ballots displayed here will be an exact match for those used at your polling place. Sample ballots are in Adobe Acrobat format. If you do not have Adobe Reader installed on your computer, visit the Adobe website at http://get.adobe.com/reader to download the reader free of charge.</p> <p>If a "Page 2" link is displayed for the ballot you've requested, you will need to download the documents from both links in order to view your complete ballot.</p> <p align="center">Ballot information is currently unavailable</p>	
<p align="center">Your Elected Representatives</p>	
Officials Elected Statewide	U. S. Congress: District District 004 Congressional District Maps Georgia Senate: District 10 Georgia House: District 091
<p>Please Note: Polling places are subject to change. Always check your designated polling place location via this website prior to going to vote.</p>	