IN THE

Supreme Court of Indiana

No.

Court of Appeals Cause No. 49A02-0901-CV-00040

LEAGUE OF WOMEN VOTERS OF INDIANA, INC. and LEAGUE OF WOMEN VOTERS OF INDIANAPOLIS, INC.,	)	Appeal from the Marion Superior Court Civil Division, 13
Appellants (Plaintiffs below),	)	Trial Court Cause No. 49D13-0806-PL-027627
v.	)	
TODD ROKITA, in his official capacity as Indiana Secretary of State,	)	The Honorable S.K. Reid, Judge
Appellee (Defendant below).	)	

REPLY IN SUPPORT OF PETITION TO TRANSFER

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STATEMENT OF THE ISSUES

1. Whether an action seeking a declaratory judgment that a statute is invalid is justiciable against a state official who does not enforce the statute.

2. Whether, under Article 1, Section 23 of the Indiana Constitution, the General Assembly may require in-person voters to show photo identification to poll workers they meet face-to-face, but not require absentee voters to mail photo identification to officials who will not see the voter's face.

3. Whether Article 1, Section 23 permits the General Assembly to exempt residents of state-licensed care facilities who vote where they live from having to show government-issued photo identification at the polls.

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I. The Voter ID Law Comports with Article 1, Section 23

A. The *Collins* test is essentially a rational basis test, and this Court has expressly rejected more rigorous scrutiny

1. Article 1, Section 23 analysis is distinct from federal equal protection analysis, but that does not mean it is more burdensome for the government. By its own terms, *Collins v. Day*, 644 N.E.2d 72 (Ind. 1994), sets forth a highly deferential standard for reviewing legislative classifications; ultimately, the *Collins* standard boils down to a rational basis test. Under *Collins*, a classification "must be based upon distinctive, inherent characteristics which *rationally* distinguish the unequally treated class, and the disparate treatment accorded by the legislation must be *reasonably* related to such distinguishing characteristics." *Id.* at 79 (emphases added). Not only is a classification presumed constitutional, but the "burden [is] upon the challenger to negat[e] *every conceivable basis* which might have supported the classification." *Id.* at 80 (internal quotation omitted) (emphasis added). It is difficult to imagine constitutional analysis more deferential to state line-drawing.

It is particularly problematic to deem "irrational" or "arbitrary," *Collins*, 644 N.E.2d at 79, a classification that has been upheld by all three levels of the federal judiciary and an Indiana trial court. Just because the *Collins* test is analytically distinct from federal constitutional standards, that does not mean that terms like "rational," "arbitrary," and "reasonable" have different meanings. At least in this

regard, therefore, the *Crawford* line of cases most assuredly should bear on this Court's decision.

2. One way Article 1, Section 23 analysis substantially differs from federal equal protection analysis is that there is no heightened scrutiny when a fundamental right is at stake. In *Collins*, the Court stated that "[t]he resolution of Section 23 claims does not require an analytical framework applying varying degrees of scrutiny for different protected interests." *Collins*, 644 N.E.2d at 80. Thus, Section 23's deferential review applies equally to all charges of "improper grants of unequal privileges and immunities, including not only those grants involving suspect classes or impinging upon fundamental rights but other such grants as well." *Id*.

Accordingly, the suggestion of Professors Madison, Levinson, and Etcheson that Indiana history demonstrates a trend over time toward greater voter participation has no doctrinal relevance. A particular historical narrative cannot, under *Collins* and its progeny, justify ratcheting up the level of scrutiny under Section 23. Nor do the historical events the Professors recite justify *judicial* creation of new voting rights. The political act of creating a new Constitution expanded rights in some ways. But, given that the 1851 Constitution expressly limited suffrage to adult white males (*see* Professors' Br. 8 n.2), its framers can hardly be said to have planted in Article 1, Section 23 some indeterminate seed of "political inclusion" later to be cultivated by the judiciary. As the Professors ably document, subsequent *political* reforms—constitutional amendments and statutes—

yielded greater political inclusion. *See* Professors' Br. 6-9**.** But that political history cannot justify *judicial* second-guessing of Voter ID, a modern-day political reform intended to protect the sanctity and full value of each legitimate vote and thereby to protect the very expanded suffrage that the Professors document.

Notably, the Professors do not rely on their historical narrative to argue that the General Assembly cannot enact a law requiring photo identification at the polls. Indeed, they even acknowledge that Article 2 of the Constitution, which regulates elections, "does not require a particular set of procedures" (*id.* at 10), which is why they have cast their arguments against the Voter ID Law in Article 1, Section 23 terms. The only legal argument they can ultimately muster, however, is that the State's history of "expand[ing] political participation" weighs against the *exceptions* to the Voter ID Law. *Id.* at 12. Eliminating the exceptions to the identification requirements, however, would not seem to "'promote[] political inclusion'" (*id.* at 9 (quoting *Price v. State*, 622 N.E.2d 954, 962 n.10 (Ind. 1993)), so the Professors' point is hard to decipher.

In any event, history does not justify changing the Court's well-established, uniform approach to equal privileges and immunities, which permits no "probing review of any classifications," period. *Id.* at 11. Plaintiffs suggest that something more rigorous than rational basis should apply here, and in fact urge judicial "balancing" of the competing interests at stake. *See* League's Resp. 5-7. Many of their amici—indeed, all that actually bother to address the proper level of scrutiny—also urge the Court to adopt a more rigorous inquiry, implying that they

concede defeat under the extant *Collins* standard. *See* ACLU Br. 3-7, 9; Professors' Br. 11-13; U.S. League Br.[1] 1-2, 5-7; NAACP Br. 1-3, 10; Lawyers' Committee Br. 9-10. The Court should reject these invitations and maintain the deferential review that has long prevailed under Article 1, Section 23. *See Cincinnati, H. & D. Ry. Co. v. McCollom*, 109 N.E. 206 (Ind. 1915); *Collins*, 644 N.E.2d at 79-80.

3. Finally, even if *Collins* sets forth something other than a rational basis test, and even if the State has some evidentiary burden it must meet to support classifications within the Voter ID Law, the Court of Appeals' summary disposition of this case was improper. If the State has a burden that it has not yet met, it must be given a chance to meet it.

The League claims that summary disposition is proper under Appellate Rule 66(D), which authorizes the Court of Appeals to "direct that Final Judgment be entered . . . without a new trial or hearing unless this relief is impracticable or unfair to any of the parties or is otherwise improper." League's Resp. 14. The word "new," however, signals that final judgment may only be entered if there has been a trial or hearing *in the first instance*. There has been nothing of the kind here. Beyond that, the rule also forecloses summary disposition on appeal where it would be "unfair to any of the parties[.]" Ind. Appellate Rule 66(D). Treating the State's

[1] The League of Women Voters of the United States is perhaps typical of this approach when it says that "[a]lthough courts are to accord deference to the legislature in reviewing classifications, such deference does not preclude a highly skeptical review of any regulation that impacts or limits a fundamental right such as voting." U.S. League Br. 5. Actually, precluding "highly skeptical review" is *exactly* what "accord[ing] deference to the legislature" means. Thus, the U.S. League is demanding a higher standard than the Court has employed in *Collins* and other Article 1, Section 23 cases.

motion to dismiss as if it were the League's motion for summary judgment is the epitome of "unfair." The case has not reached the stage when the parties may come forward with evidence, so the State has not been permitted to put the plaintiffs to their burden or to submit its own evidence. Indeed, rejecting a motion to dismiss means that a case cannot yet turn on a pure question of law, so the League's Rule 66(D) cases are inapposite.

B. The Court of Appeals and the League both misapply *Collins*

The Court of Appeals held that, under Article 1, Section 23, mail-in voters should have to send photo identification with their ballots, just as in-person voters must present photo identification at the polls, even though poll workers will never see the faces of the mail-in voters. *League of Women Voters of Indiana, Inc. v. Rokita*, 915 N.E.2d 151, 163 (Ind. Ct. App. 2009) ("*LWV*"). It also said that the legislature cannot waive the photo identification requirement for elderly and disabled voters who vote in the state-licensed care facilities where they live without waiving it for all elderly and disabled voters, on the theory that obtaining identification is necessarily equally difficult for *all* elderly and disabled voters. *Id.* at 164-65.

Understandably, the League does not attempt to defend the Court of Appeals' reasoning. It instead facially attacks not the Voter ID Law's exceptions, but the general rule that in-person voters must present photo identification at the polls. *See* League's Resp. 10. The only inquiry under Section 23, however, is the

justification for any exceptional treatment, *not* the overall reasonableness of the general rule. *See Collins*, 644 N.E.2d at 80.

In this regard, the League falls into a familiar trap under *Collins* of arguing that the reason for having the Voter ID Law does not justify the exceptions. League's Resp. 5. What actually matters is whether *any* conceivable, legitimate government objective—which need not relate to the objective of having the rule in the first place—justifies an exception. That is what it means to ask whether the "disparate treatment accorded by the legislation" is "reasonably related to inherent characteristics which distinguish the unequally treated classes." *Collins*, 644 N.E.2d at 80. "Inherent characteristics" may well justify differential treatment even if—indeed, precisely *because*—they relate to competing policy objectives.

That is the rationale, for example, of *Horseman v. Keller*, 841 N.E.2d 164 (Ind. 2006), where the policy of including in recounts ballots originally excluded for clerical errors was, with respect to absentee ballots, overridden by the competing policy concern of safeguarding vote tallies from improper outside influences that occur with absentee (but not in-person) voting. *See id.* at 172. There, the exception for absentee ballots was justified not by the reason supporting the main rule, but by another legitimate government policy. Here, as it happens, both the reason for the main rule (to safeguard against in-person voter fraud) and other reasons (not unnecessarily burdening particular segments of voters having special characteristics) justify exceptions where there are no in-person voters (mail-in absentee) and where there is categorically far less chance of fraud but categorically

greater negative impact of the law (nursing home residents who vote where they live).

1. Disparate treatment of mail-in absentee voters and in-person voters is reasonably related to their inherent differences

The relevant characteristic that distinguishes in-person voters from mail-in absentee voters for purposes of the Voter ID Law is that in-person voters have face-to-face contact with poll workers and mail-in voters do not. Thus, photo identification is required for in-person voting, where election workers may effectively compare the photograph on the voter's ID with the voter's actual face. Photo identification is not useful for mail-in absentee voters because there is no such comparison to be made.

The League does not refute this argument. Its only response is to say that "[t]he comparable ease of comparing a voter's face to the identification when the voter is in front of the pollworker cannot suffice as a justification for a law intended to prevent nonexistent fraud." League's Resp. 12; *see also* League's Resp. 10 ("there is nothing that 'peculiarly requires and necessitates' exclusive legislation requiring presentation of a specific and not easily obtainable identification from an in-person voter to prevent a type of fraud that does not exist.") (quoting *McIntosh v. Melroe Co.*, 729 N.E.2d 972, 992 (Ind. 2000)). The League's only argument thus appears to be that there is no such thing as in-person voter fraud, so there should be no Voter ID Law.

The legislature concluded, as is its prerogative, that in-person voting fraud is a sufficient threat[2] that an appropriate electoral safeguard is photo identification at the polls, where workers can check faces against IDs. That is hardly an "irrational" or "arbitrary" decision. There is no requirement in Article 1, Section 23 (or Article 2, Section 2 for that matter) that the State prove any level of need in order to justify legislation. Furthermore, the Voter ID safeguard deemed necessary by the legislature justifies legislation that is, as the League puts it, "exclusive" to in-person voting because that type of voting has the "peculiar" characteristic of enabling poll workers to check IDs against faces.

Nonetheless, the League contends that the exception for mail-in absentee voters is somehow unreasonable because "there is absolutely no basis for assuming[] that citizens who vote in person are inherently more prone to commit fraud than those who mail in an absentee ballot." League's Resp. 11. This argument misses the point entirely. The State has a compelling interest in preventing all election fraud, and because in-person fraud occurs, and can be detected and deterred, in ways inherently different from mail-in fraud, the State may enact different preventive measures. The Legislature has enacted *other* measures to safeguard the integrity of absentee voting, by regulating the receipt, handling, transport, storage and counting of absentee ballots. *See, e.g.,* Ind. Code §§ 3-11-10-1, 3-11-10-3 to -23. The legislative question (which limits the Court's inquiry) is not "where does the

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[2] It is also worth observing that, in upholding the Voter ID Law, Justice Stevens' plurality opinion fully embraced the notion that in-person voter fraud exists and is hard to detect, even if it is not conclusively documented. *See Crawford v. Marion County Election Bd.*, 128 S.Ct. 1610, 1619 (2008).

most vote fraud occur?" It is instead, "how can vote fraud be prevented?" The latter question yields different answers for in-person fraud and mail-in fraud.

2. The state-licensed care facility exception is reasonably related to the inherent characteristics of residents who vote where they live

The League argues that the exception for residents of state-licensed care facilities who vote where they live should apply to all elderly and disabled voters because the nursing-home workers who know these voters are not necessarily poll workers. League's Resp. 13. The League thus once again abandons the Court of Appeals' reasoning, which was that all elderly and disabled voters should be exempt because all will have a hard time obtaining identification. *LWV*, 915 N.E.2d at 164. But the League's argument does not even respond to, let alone negate, the State's argument in support of this limited exception.

What distinguishes voters who live in the same facility where they may vote is that they may vote in person without having to travel, which is not true for other elderly and disabled voters. This inherent difference justifies an accommodation for particularly disadvantaged voters who may not be able to travel to obtain photo identification, but who also do not *need* to travel to vote at the polls. The General Assembly balanced the policy benefits of encouraging in-person voting against the policy benefits of requiring photo identification and sided with encouraging in-person voting for this inherently distinct set of voters whose members cannot care for themselves and are therefore categorically far less likely than the general voting population to commit voter impersonation fraud.

C. Extra-record studies cited by the League and its amici are irrelevant to Article 1, Section 23 analysis, and none credibly supports their positions anyway

None of the data relied upon by the League and its amici that supposedly show the negative disparate impacts of the Voter ID Law on various social groups is relevant to whether the General Assembly may require photo identification of in-person voters but not mail-in voters. Furthermore, none of it has ever been subjected to adversarial testing, so it cannot be the basis for any final judgments by the Court. In any event, the data reported in these studies do not support legitimate criticism of the Voter ID Law.

1. The study by Michael Pitts and Matthew Neuman, *Documenting Disfranchisement: Voter Identification at Indiana's 2008 General Election* 25 J.L. & Pol. __ (forthcoming 2010), with all its disclaimers and limitations,[3] found only that in the 2008 general election "'902 persons arrived at a polling place without valid identification, cast a provisional ballot, and then had that ballot go uncounted[.]'" League's Pet. 9 (quoting Pitts, *supra*, at 9). Even without testing the soundness of Pitts's methodology or considering *why* those votes went uncounted, the minuscule

[3] *See, e.g.,* Pitts, *supra*, at 9 ("In short, at this point a survey of local election officials is the only way to gather data about the impact of photo identification on election-day provisional balloting and, unfortunately, we have no ability to definitively verify the survey's accuracy"); at 25 ("Unfortunately we have no way of verifying the accuracy of the voter identification numbers given by local officials. Indeed, some of these would seem to be wrong on their face"). Also, referring to a survey by R. Michael Alvarez, *et al., 2008 Survey of the Performance of American Elections* 59 (2009), that supposedly shows persons without ID avoided the polls, Pitts says "the survey was nationwide and included persons from Indiana, but none of the respondents from Indiana indicated that not having the right kind of identification was a reason for avoiding the polls." Pitts, *supra*, at 12.

impact Pitts has supposedly documented confirms the reasonableness of the Voter ID Law. Uncounted provisional ballots supposedly caused by the Voter ID Law amounted to only 0.032% of the total ballots cast (Pitts, *supra*, at 9 n.42) which demonstrates that the vast majority of the voting population had no problem complying with the Voter ID Law.

Furthermore, without knowing *why* voters did not validate provisional ballots (maybe they were fraudulently cast or maybe voters who left their valid ID at home on election day simply chose not to validate their provisional ballots), all that can be said is that, in the entire state, about 900 voters without ID on election day cast provisional ballots and did not validate them. Even if accurate, that data does not support the argument that the Voter ID Law imposes unfair or excessive burdens on voting.

2. Next, the study by Matt Barreto, Stephen Nuño & Gabriel Sanchez *The Disproportionate Impact of Voter-ID Requirements on the Electorate – New Evidence from Indiana*, 42 Pol. Sci. & Pol., Issue 1, 3-4 (Jan. 2009) ("Barreto II"), cited at pages 11 and 12 of the Political Scientists' brief, presents survey data as to whether various segments of the population have "access" to valid photo identification. This is actually a re-published version of the same Indiana survey data that Barreto published in 2007 and, though it was supplied to the Supreme Court in the *Crawford* case, it was cited by *none* of the Justices. *See* Reply Brief for Petitioners, *Crawford v. Marion County Election Bd.*, 128 S.Ct. 1610 (2008) (No. 07-21), 2007 WL 4618316, at *13 (citing Matt A. Barreto, *et al.*, *The Disproportionate*

Impact of Indiana Voter ID Requirements on the Electorate (Wash. Inst. for the Study of Ethnicity & Race, Working Paper, Nov. 8, 2007) ("Barreto I")). That the League did not put the 2007 Barreto study before the trial court in response to the State's motion to dismiss speaks volumes about the study's lack of relevance and strength.

New or old, the Barreto study, which has not been published in a peer-reviewed journal, suffers from obvious methodological flaws, including its definition of "access" to photo identification, its sampling techniques, and its failure to utilize any controlling variables in its regression analysis.[4] *See* Barreto II, *supra*, at 113 table 1. There are serious questions whether this study (or the Pitts study, which also was not published in a peer-reviewed journal) could even survive a Rule 702 objection.

Furthermore, the Barreto data fails to demonstrate any significant disparate impacts. For example, it shows only a nominal 4.3% gap between white and black registered voters with respect to possessing accurate, valid photo identification. *Id.* at 113, table 2. It is notable that, in the 2007 presentation of this data, Barreto and his co-authors candidly conceded that this 4.3% gap is not significant under the "traditional 95%" test. Barreto I, *supra*, at 13.

Barreto's 2007 Indiana survey data also showed no wealth-based disparities in terms of possessing photo identification. In fact, it showed that voters with

[4] Notably, the Pitts Study itself critiques Barreto's methodology, saying that it "is subject to criticism because it does not definitively show that persons who lack photo identification would actually go to the polls." Pitts, *supra*, at 4.

income over $80,000 are 4.5% *less* likely to possess photo identification than those between $40,000 and $80,000, and that there is no statistically significant difference between those earning under $40,000 (80.5%) and those earning over $80,000 (83.5%). Barreto I, *supra*, at 21, Fig. 3. Neither Barreto's 2009 publication nor his amicus brief cites these inconvenient survey results. Instead, to demonstrate a possible disparate impact based on wealth, Barreto relies on a separate survey of Orange County, California, Bernalillo County, New Mexico, and King County, Washington, which plainly says nothing about Indiana. Barreto II, *supra*, at 115, table 4.

Finally, Barreto's study found no statistically significant difference between Democrat and Republican voters possessing accurate, valid identification. Barreto II, *supra*, at 114 table 3; Barreto I, *supra*, at 23 table 2. The nominal 3.9% difference (81.7% Democrat to 86.2% Republican) that Barreto's survey purports to document is smaller than the margin of error of ± 3.1% for each variable. Barreto I, *supra*, at 8; Barreto II, *supra*, at 114 table 3.

3. If the Court is interested in statistical studies concerning the impact of the Voter ID Law (and it should not be for purposes of the issues in this case), it should also be aware of a November 2007 study by Jeffrey Milyo of the Truman School of Public Affairs at the University of Missouri that compared data from the 2002 and 2006 elections (*i.e.* the congressional mid-term elections immediately preceeding and following implementation of the Voter ID Law). *See* Jeffrey Milyo, *The Effects of Photographic Identification on Voter Turnout in Indiana: A County-*

Level Analysis Inst. of Pub. Policy, Report No. 10-2007 at 1 (2007). Milyo reported that, after Indiana implemented the Voter ID law, "[o]verall, voter turnout in Indiana *increased* about two percentage points." *Id.* (emphasis added). He also found "no consistent evidence that counties that have higher percentages of minority, poor, elderly or less educated population suffer any reduction in voter turnout relative to other counties." *Id.* at Abstract 1, 5-7. Milyo concluded: "The only consistent and frequently significant effect of voter ID that I find is a positive effect on turnout in counties with a greater percentage of Democrat leaning voters." *Id.* at 1.

Again, however, statistical studies of the impact of the Voter ID Law are not relevant to whether the Voter ID Law and its exceptions are valid under Article 1, Section 23 (or Article 2, Section 2 for that matter).

II. On Transfer, the Court Gets the Whole Case

In its opinion, the Court of Appeals included a separate section where it arrived at the unremarkable conclusion that "the Voter I.D. Law's exception of those residing in state licensed care facilities, which happen to also be a polling place" is not "a uniform or impartial regulation." *LWV*, 915 N.E.2d at 168. It also observed, again unremarkably, that "the Voter I.D. Law treats in-person voters disparate from mail-in voters, conferring partial treatment upon mail-in voters." *Id.* Regardless of any separate fancy doctrinal gloss, the Court of Appeals' decision to label these exceptions as "partial" or "not impartial" means nothing different from its conclusion that they are unjustified by inherent characteristics that

distinguish the classes created. The fact remains that the State has placed these issues—whether the exceptions are "partial" or whether they are justified—squarely before the Court. Particularly given the word limits placed on petitions to transfer, it did not need to repeat its defenses of the Voter ID Law using different code words simply because the Court of Appeals chose to do so.

Regardless, Appellate Rule 4(A)(1) provides for this Court's "mandatory and exclusive jurisdiction" in "[a]ppeals of Final Judgments declaring a state or federal statute unconstitutional in whole or in part." The League does not dispute that this rule *requires* this Court to transfer jurisdiction in this case, nor does it dispute that the State petitioned the Court to transfer jurisdiction not of any issues, but of *the case*. State's Pet. 1. By rule, when the Court grants transfer, it "shall have jurisdiction over the appeal and all issues as if originally filed in the Supreme Court." Ind. Appellate Rule 58A. Thus, once the Court grants transfer it will review the appeal brought by the *League*, not the State, and all issues appealed will be ripe for review.

CONCLUSION

When rejecting another challenge to the Voter ID Law, Judge Barker commented that "[t]his litigation is the result of a partisan legislative disagreement that has spilled out of the state house into the courts." *See Ind. Democratic Party v. Rokita*, 458 F. Supp. 2d 775, 783 (S.D. Ind. 2006). She continued, "in moving to this judicial forum, in many respects [Plaintiffs] have failed to adapt their arguments to the legal arena." *Id.* Here, similarly, it is clear that the League and its allies

simply do not like Indiana's Voter ID Law. As Judge Barker recognized, however, the appropriate forum for their arguments is the legislature, not the judiciary.

This Court should transfer jurisdiction from the Court of Appeals and affirm the decision of the trial court dismissing the case.

Respectfully submitted,

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WORD COUNT CERTIFICATE

As required by Indiana Appellate Rule 44, and pursuant to the Court's Order of November 18, 2009, I verify that this Petition to Transfer contains no more than 4,200 words.

_____

Thomas M. Fisher
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CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of November, 2009, a copy of the foregoing was served via First Class United States mail, postage pre-paid to the following:

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