

LEAGUE OF WOMEN VOTERS OF TEXAS,
TEXAS STATE CONFERENCE OF THE
NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE
(NAACP) and RUTHANN GEER,

VS.

Defendants.

[illegible]

98th JUDICIAL DISTRICT

Pursuant to Tex. R. Civ. P. 680 and 681, Plaintiffs in the above-captioned matter hereby move the Court to issue a Temporary Restraining Order and Temporary Injunction enjoining Defendants Rolando Pablos and Keith Ingram from releasing information from the State of Texas’s Computerized Voter Registration List (the “Voter List”) to the Presidential Advisory Commission on Election Integrity (the “Commission”), and to take all actions necessary to maintain the status quo ante pending a determination on the merits.

FACTS

Background on this action

1. Plaintiffs filed the above-captioned action on July 20, 2017, seeking to prevent Defendants from releasing the Voter List to the Commission without the Commission first complying with all aspects of Tex. Elec. Code § 18.066, *et seq.*, including protections against the commercial use of Voter List information.
2. Plaintiffs also filed this action to prevent the release of birth dates of part of the Voter List in violation of Tex. Gov't Code § 552.101 and Texas law generally.

Privacy protections for voter data under Texas law

3. Texas law prohibits the use of the Voter List “in connection with advertising or promoting commercial products or services,” which is classified as a Class A misdemeanor. Tex. Elec. Code § 18.067.
4. The importance of this law is reinforced by the requirement that any request for voter information must be accompanied by “an affidavit to the secretary stating that the person will not use the information obtained in connection with advertising or promoting commercial products or services.” Tex. Elec. Code § 18.066(d).

5. Additionally, Texas law prohibits the Secretary of State from releasing (i) any voter's social security number; or (ii) certain residential addresses. Tex. Elec. Code § 18.066(b).
6. Texas courts have recognized a “nontrivial privacy interest” in birth dates. *See Paxton v. City of Dallas*, No. 03-13-00546-CV, 2015 WL 3394061, at *3 (Tex. App. May 22, 2015) (concluding that “public citizens have a privacy interest in their birth dates”), *review denied* (Sept. 4, 2015); *Tex. Comptroller of Pub. Accounts v. Att’y Gen. of Tex.*, 354 S.W.3d 336, 346-48 (Tex. 2010) (holding that disclosure of state employee birth dates constituted a “clearly unwarranted invasion of personal privacy”); *see also* Tex. Att’y Gen. Op. OR2017-06026 (2017) (“Based on *Texas Comptroller*, the court of appeals [in *City of Dallas*] concluded the privacy rights of public employees apply equally to public citizens, and thus, public citizens’ dates of birth are also protected by common-law privacy”). In doing so, courts have recognized the derivative harm arising from the release of information, including the threat that the disclosure of birth dates, along with other information, could be used for identity theft. Specifically, the Texas Supreme Court acknowledged in *Texas Comptroller* that the disclosure of “[birth] dates, when combined with name and place of birth, can reveal social security numbers.” 354 S.W.3d at 345.

The Commission's requests for voter data

7. The Commission was established by President Donald Trump through Executive Order 13,799. Its stated mission is to “study the registration and voting processes used in Federal elections,” and to issue a report that addresses, *inter alia*, (i) “those laws, rules, policies, activities, strategies, and practices” that either “enhance” or “undermine the American people’s confidence in the integrity of the voting processes used in Federal elections;” and (ii) “vulnerabilities in voting systems and practices used for Federal elections that could lead to improper voter registrations and improper voting, including fraudulent voter registrations and fraudulent voting.” Exec. Order No. 13,799, 82 Fed. Reg. 22,389 (May 16, 2017).
8. On June 28, 2017, the Commission sent letters to all 50 states (and the District of Columbia), including Texas, seeking a wide range of information pertaining to each state’s voters, including name, address, demographic information, partial social security numbers, party affiliations, criminal felony convictions, registration and voting histories, and more. In doing so, the Commission clearly stated that any information sent to it would become public. The Commission initially requested that Texas and the other states respond by July 14, 2017.

9. On July 26, 2017, the Commission sent a second letter to all fifty states and the District of Columbia seeking voter data, including to Defendant Pablos. In this letter, the Commission purported to protect “any personally identifiable information” from the data it received.
10. On September 7, 2017, the Commission submitted to Defendants a request for voter data using the Secretary of State’s official form, known as the Texas Voter Registration Public Information Request Form. The request seeks data for the entire state, including “active,” “suspense,” and “cancelled” voters.
11. On September 13, 2017, the Commission submitted to Defendants a revised request for voter data using the Texas Voter Registration Public Information Request Form.
12. On information and belief, Defendants intend to respond to the Commission’s request and provide Texas voters’ data by September 28, 2017.

Transparency requirements in federal law

13. As an advisory committee covered under the Federal Advisory Committee Act (FACA), 5 U.S.C. § App. 2, the Commission must make available for inspection all “the records, reports, . . . or other documents which were

made available” to it unless those records fall within one of the enumerated exceptions. 5 U.S.C. App. 2 § 10(b).

14. Indeed, the Commission has already been sued to compel its compliance with FACA’s transparency requirements. *See Lawyers’ Committee for Civil Rights Under Law v. Presidential Advisory Commission on Election Integrity, et al.*, No. 1:17-cv-01354 (D.D.C. July 10, 2017).

15. The Commission has submitted the Texas Voter Registration Public Information Request Form, but that form does not contemplate a scenario in which the requester is governed by a statute with disclosure requirements like those set forth in FACA.

16. On information and belief, the Commission has made no public representations as to how it will ensure the privacy of the Voter List while maintaining compliance with FACA.

The risk of harm to Plaintiffs

17. Plaintiff League of Women Voters of Texas consists of over 2,000 members, the vast majority of whom are Texas residents who are registered to vote in the state. Their personal information, including names, addresses, and dates of birth, is included in the Voter List that the Secretary of State intends to release to the Commission.

18. Plaintiff Ruthann Geer is a registered Texas voter whose personal information, including name, address, and date of birth, is included in the Voter List that the Secretary of State intends to release to the Commission.
19. The identifying information on the Voter List, if made public, may be used to solicit, harass, or otherwise infringe upon the privacy of Texas voters, including the League's members and Ruthann Geer.
20. That same information, if made public, could lead to Plaintiffs' and Texas voters' information being used by others for commercial purposes in violation of Tex. Elec. Code § 18.067. State law specifically contemplates this harm and sets out the prohibition against commercial use in response.
21. If Defendants release the Voter List to the Commission, the League will be forced to redirect its resources away from its civic engagement activities and toward addressing the consequences of that action. The release of the Voter List will also make it substantially more difficult for the League to engage in voter-registration and get-out-the-vote activities, which they regularly perform in support of their civic-engagement mission. Voters and prospective voters will be more reluctant to participate in elections or register to vote in the future if they understand that the Defendants are willing to provide information on the Voter List to entities who

openly admit that they intend to make such information public, or may be compelled to do so. The public disclosure of such personal information will chill League members' as well as other voters' and prospective voters' exercise of First Amendment rights including the right to vote and freedom of association.

22. Once Defendants transmit the Voter List to the Commission, as will happen imminently absent court action, all of the implicated privacy and commercial use considerations become active concerns. Once in possession of the Voter List, the Commission could at any point release it intentionally, be compelled to release it, or have it stolen. The harm to Plaintiffs would be irreversible. But Defendants suffer no harm from withholding the release of the Voter List and maintaining the status quo while this matter is resolved.
23. The facts essential to injunctive relief are sworn to in the attached affidavits of Elaine Wiant, Ruthann Geer and Tomas Lopez.

PRAYER FOR RELIEF

WHEREFORE, the Plaintiffs request the following relief and judgment:

- A. A temporary restraining order in favor of Plaintiffs and against the Defendants, and entry of a temporary injunction enjoining the Defendants, Secretary of State Rolando Pablos, and Keith Ingram, Director, Texas Elections Division, from providing the Voter List

and any part thereof to the Commission, and to take all actions necessary to maintain the status quo ante pending a determination on the merits.

- B. Such other and further relief as the Court deems just in the premises.

Respectfully submitted,

LAW OFFICE OF CHARLES McGARRY

/s/ Charles W. McGarry

Charles W. McGarry
Texas Bar No. 13610650
701 Commerce Street, Suite 400
Dallas, Texas 75202
(214) 748-0800
(214) 748-9449 fax
cmcgarry@ix.netcom.com

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New York, NY 10271
(646) 292-8310 phone
(212) 463-7308 fax
myrna.perez@nyu.edu
wendy.weiser@nyu.edu
tomas.lopez@nyu.edu
(Applications for admission
pro hac vice forthcoming)

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Susan M. Davies, Esq.

Michael A. Glick, Esq.

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(202) 879-5200 fax

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susan.davies@kirkland.com

michael.glick@kirkland.com

*(Applications for admission pro hac vice
forthcoming)*

ATTORNEYS FOR PLAINTIFFS

LOCAL RULE CERTIFICATION

This Application will not be presented *ex parte*. It is being served in accordance with the Certificate of Service, below, and opposing counsel will be notified of the time and place of hearing.

/s/ Charles W. McGarry

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of this instrument was delivered to the following attorney of record on this 21st day of September 2017, in accordance with the Texas Rules of Civil Procedure:

Esteban S.M. Soto
Assistant Attorney General
General Litigation Division
Office of the Attorney General
300 West 15th Street
Austin, TX 78701
Phone: 512-475-4054
Fax: 512-320-0667
Esteban.Soto@oag.texas.gov

/s/ Charles W. McGarry
Charles W. McGarry

§ §

IN THE DISTRICT COURT

TRAVIS COUNTY, TEXAS

28th JUDICIAL DISTRICT28th JUDICIAL DISTRICT

I affirm the following to be true under the penalties of perjury:

1. I am the President of the League of Women Voters of Texas. I have served in this capacity since June 1, 2014.
2. In my capacity as President of the League of Women Voters of Texas, I coordinate the activities of our local Leagues on a number of statewide matters. I communicate regularly with local Leagues on their voter registration and voter education activities.
3. The League is a nonpartisan political organization that encourages informed and active participation in government, and fights to improve our systems of government and to impact public policies. Our organization's main purpose is to encourage people to vote, keep them informed as voters, and also seek out information from candidates and public officials to serve the electorate and citizenry.

4. The League executes its civic engagement mission in a number of ways, including through voter registration and get-out-the-vote activities. Last year, the League, through its twenty-five local chapters, conducted at least two hundred voter registration drives.
5. The League has over 2,000 members, the vast majority of which are Texas residents who are registered to vote in the state. Their information is included in the voter list that the Secretary of State intends to release to the Presidential Advisory Commission on Election Integrity.
6. If the Secretary of State is permitted to provide voter data to the Commission, the personal information of League members will be included in any data set released. I understand this to include, among other things, names; residence and postal addresses; and dates of birth.
7. I am concerned about the harm that will result if League members' personal information is handed over to the Commission, especially as it relates to the impairment of their privacy.
8. I specifically fear that the Commission will make personal information public, as it initially promised, that it will be forced to make that information public by law, or that hackers will access that data.
9. Regardless of the way in which this information is made public, I am concerned that League members could be subject to harassment and intimidation by those who may oppose their viewpoints or participation in our organization. I worry that the public release of names, addresses, and birth dates, among other details, would allow malicious individuals to reach individuals directly or otherwise use that information to harass them.

10. I am also concerned about the vulnerability of League members' personal information to identity thieves. I understand that the Commission has not promised the Secretary of State that it would use specific security measures to protect individuals' information.
11. Furthermore, if Texans' personal information is released, our organization will be forced to redirect its resources away from its civic engagement activities and toward addressing the consequences of the Secretary of State's action. I believe that voters and prospective voters will be more reluctant to participate in elections or register to vote in the future if they understand that the Secretary of State is willing to provide their personal information to entities who openly admit that they intend to make such information public. The League will therefore expend more time and attention educating and assisting Texas citizens with regard to the protection (or, in this case, non-protection) of their personal information.
12. I understand that whenever the Commission makes personal information public, whether deliberately or otherwise, it will be effectively impossible to get back. This harm cannot be undone.
13. If the Secretary of State is permitted to provide League members' personal information, including dates of birth, to the Commission, that information will be immediately vulnerable to both security breaches and its deliberate or compelled release.

Executed this 19 day of September 2017.



Elaine Wiant
President, League of Women Voters of Texas

No. D-1-GN-17-003451

LEAGUE OF WOMEN VOTERS OF TEXAS,
TEXAS STATE CONFERENCE OF THE
NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE
(NAACP) and RUTHANN GEER,

Plaintiffs,

VS.

ROLANDO PABLOS, Secretary of State For the State of Texas, and KEITH INGRAM, Director, Texas Elections Division of the Secretary of State,

Defendants.

IN THE DISTRICT COURT

TRAVIS COUNTY, TEXAS

98th JUDICIAL DISTRICT

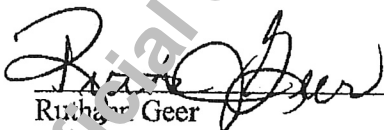
**AFFIDAVIT OF RUTHANN GEER IN SUPPORT OF PLAINTIFFS' APPLICATION
FOR A TEMPORARY RESTRAINING ORDER AND TEMPORARY INJUNCTION**

I affirm the following to be true under the penalties of perjury:

1. I am an instructor of government at Tarrant County College and a resident of Burleson, Texas. I also currently serve as chair of the Statewide Nominating Committee of the League of Women Voters of Texas in a volunteer capacity, and formerly served as the organization's president.
2. I am a registered Texas voter and understand that my name and personal information appears on the state's voter registration list.
3. If the Secretary of State is permitted to provide voter data to the Presidential Advisory Commission on Election Integrity, my personal information will be included in any data set provided. I understand this to include, among other things, my name; residence and postal address; and my date of birth.
4. I am concerned about the harm that will result if my personal information is handed over to the Commission, especially as it relates to the impairment of my privacy.

5. I specifically fear that the Commission will make my personal information public, as it initially promised, that it will be forced to make my information public by law, or that hackers will access that data.
6. Regardless of the way in which my information is made public, I fear that I could be subject to harassment and intimidation by those who may oppose my viewpoints or participation in the League of Women Voters. I worry that the public release of my name, address, and date of birth, among other details, would allow malicious individuals to reach me directly or otherwise use that information to harass me. I am especially concerned about this because I live alone in a rural part of the state.
7. I am also concerned about the vulnerability of my personal information to identity thieves. I understand that the Commission has not promised the Secretary of State that it would use specific security measures to protect my and other people's information.
8. I understand that whenever the Commission makes my personal information public, whether deliberately or otherwise, it will be effectively impossible to get back. This harm cannot be undone.
9. If the Secretary of State is permitted to provide my personal information, including my date of birth, to the Commission, that information will be immediately vulnerable to both security breaches and its deliberate or compelled release.

Executed this 20th day of September 2017.


Ruthann Geer

IN THE DISTRICT COURT OF THE UNITED STATES FOR THE DISTRICT OF COLUMBIA

TRAVIS COUNTY, TEXAS

98th JUDICIAL DISTRICT

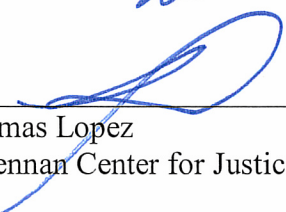
Defendants.

I affirm the following to be true under the penalties of perjury:

1. I am an attorney at the Brennan Center for Justice at NYU School of Law, counsel for Plaintiffs in the above-captioned matter. I submit this affirmation in support of Plaintiffs' application for a temporary restraining order and temporary injunction.
2. On September 7, 2017, Defendants' counsel informed Plaintiffs' counsel via email that Defendants received a "Voter Registration Public Information Request Form" that same day from Ron Williams, Policy Advisor to the Presidential Advisory Commission on Election Integrity (the "Commission").
3. In their email message to Plaintiffs' counsel, Defendants' counsel included a digital copy of the above-referenced form, which also included an affidavit submitted by Mr. Williams.
4. This form and affidavit are attached hereto as Exhibit 1.

5. On September 19, 2017, Defendants' counsel informed Plaintiffs' counsel that Defendants received a revised "Voter Registration Public Information Request Form" dated September 13 from Ron Williams. Defendants' counsel also provided Plaintiffs' counsel with a digital copy of this form, which also included an affidavit submitted by Mr. Williams.
6. This second form and affidavit are attached hereto Exhibit 2.
7. Pursuant to representations made by Defendants' counsel, it is our understanding that, absent an injunction, Defendants will provide the requested voter information to the Commission within fifteen days of the receipt of the revised request form, or on or before September 28, 2017.

Executed this 20th day of September 2017.



Tomas Lopez
Brennan Center for Justice at NYU School of Law

Unofficial copy Travis Co. District Clerk Velda L. Price

EXHIBIT 1

The State of Texas



Elections Division
P.O. Box 12060
Austin, Texas 78711-2060
www.sos.state.tx.us

Phone: 512-463-5650
Fax: 512-477-2811
Dial 7-1-1 For Relay Services
(800) 252-8973 (8683)

Secretary of State

VOTER REGISTRATION PUBLIC INFORMATION REQUEST FORM

Media must be completed:

Media

- ☒ CD-ROM
☐ FTP - Provide FTP information:

FTP site: _____

Login: _____

Password: _____

Format being provided

Voter registration list (individual records)
in zipped fixed width text file(s). See the
attached record layout.

Requestor name:

Ron Williams

(required)

Flagging Options ONLY

- ☒ Hispanic surname flag notation

Voters may be extracted by:

Please checkmark all that apply to the request:

- ☒ Include Active Voters
☒ Include Suspense Voters
☒ Include Cancelled Voters

I would like my data reduced to the following

Please checkmark all that apply to the request:

- ☐ Only voters with Texas mailing address
☐ Only voters who are effective to vote between
_____ and _____ dates
☐ Only voters between the age _____ and _____
☐ Hispanic Surnames only
☐ Males only
☐ Females only
☐ Voters who Voted in the following Elections:
☐ Entire State ☐ Counties listed below only

Elections and Years:

A "suspense voter" is a voter known to have an incorrect or outdated address.

The county has sent the voter a form to obtain a new current address, but no response has been received. The voter is however, considered to be an active voter for voting purposes.

If the entire state is requested, mark the space provided. If a district or county is requested, list the district number or county. Write "All" by the county name to indicate all precincts). Otherwise, for partial district, county or other requests, please list the county names and applicable precinct numbers.

COUNTY NAME(S) or DISTRICT NUMBER(S)

Check if entire State ☒

NOTE: For requests in addition to the options provided on this form, please email elections@sos.texas.gov, as a data manipulation estimate may need to be provided for you.

For Internal Use Only

First Reviewer: _____

Date reviewed: ____/____/____

EFM: _____

Second Reviewer: _____

Date reviewed: ____/____/____

Date processed: ____/____/____

Completion date: ____/____/____

PUBLIC INFORMATION REQUEST FORM DETAILS AND INSTRUCTIONS

Send Order to:

Ron Williams, Policy Advisor

Presidential Advisory Commission on Election Integrity

1650 Pennsylvania Ave., NW, EEOB-Rm. 268, Washington, DC 20504

Telephone (202) **881-7807**

Send Statement to:

Kris L. Palmer, Program Analyst

General Services Administration

1800 F Street, NW, Washington, D.C. 20405

Telephone (202) **501-0525**

Below are the procedures for filling out the attached Public Information Request form. Failure to adequately complete the form may cause incorrect information or could delay the processing of your order.

1. Media Selection: CD-ROM or FTP. If selecting an FTP, please provide FTP site, login and password information.
2. Format: Voter registration list (individual records) in zipped fixed width text file(s). See the attached record layout.
3. Extracts & Data Reduction- Options may be selected to select a limited group of voters. Additional extract requests may result in data manipulation, which would result in additional charges. Section 552.231 of the Texas Government Code requires that agencies send a written statement about the cost of potentially manipulating data to any requestor. Should it be determined that your request will require data manipulation, then a statement of the estimated cost of providing the information in the requested form will be supplied to you within the timeframe outlined in section 552.231.
4. In the area for county name(s), or District Number(s), please note the following: **If the entire state is requested**, mark the space provided. **If a district or county is requested**, list the district number or county (write "All" by the county name to indicate all precincts). Otherwise, for partial district, county or other requests, please list the county names and applicable precinct numbers.
5. The attached affidavit must be signed before a notary public. A \$75.00 deposit must accompany each request. If the request is from a Member of the House or Senate, the Member must submit the request through the appropriate business office for approval of funds before submitting it to this office, unless the request is being paid for out of personal funds. CD-ROM will not be released and/or files will not be uploaded to the FTP until full payment is received. A complete address (No P. O. Box) must be provided along with a telephone number. The Secretary of State will furnish information not later than the 15th day after the date the request is received. (Texas Election Code, Section 18.066).

Please retain a copy of this form for your records. Please include a \$75.00 deposit fee with your request, made payable to the Secretary of State's Office. The Secretary of State will furnish the information not later than the 15th day after the date the request is received. Your order will not be released until full payment is received. The attached affidavit must be signed before a notary public and accompany all requests.

If you have any questions, please contact Elections Division at (512) 463-5650 or toll free at 1-800-252-VOTE (8683).

Affidavit

~~THE STATE OF TEXAS~~ *District of Columbia: SS*

~~COUNTY OF~~ _____

Before me, the undersigned authority, on this day personally appeared
Ron Williams, who being duly sworn, deposes and says:

I do solemnly swear that the information obtained from the copy of the State Master Voter File will not be used to advertise or promote commercial products or services.

[Signature]
Signature

Sworn to and Subscribe before me, this the 7 day of Sept., 2017.



[Signature]
Notary Public in and for the State of Texas

Phillip R. Pinegar
Printed Name of Notary

My commission Expires: *5-31-2022*

PLEASE BE ADVISED

§ 18.067. Unlawful Use of Master File Information

(a) A person commits an offense if the person uses information in connection with advertising or promotion of commercial products or services that the person knows was obtained under Section 18.066.

(b) An offense under this section is a Class A misdemeanor.

Acts 1985, 69th Leg., ch. 211, § 1, eff. Jan. 1, 1986.

Amended by Acts 1997, 75th Leg., ch. 864, § 13, eff. Sept. 1, 1997.

EXHIBIT 2

The State of Texas



Elections Division
P.O. Box 12060
Austin, Texas 78711-2060
www.sos.state.tx.us

Phone: 512-463-5650
Fax: 512-475-2811
Dial 7-1-1 For Relay Services
(800) 252-7611 (8683)

Secretary of State

For Internal Use Only	
Receipt date:	/ /
PIR-Log number:	

VOTER REGISTRATION PUBLIC INFORMATION REQUEST FORM

Media must be completed:

Media

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☐ FTP - Provide FTP information:

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Requestor name:

Ron Williams

(required)

Flagging Options ONLY

- ☒ Hispanic surname flag notation

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I would like my data reduced to the following
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_____ and _____ dates
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☐ Hispanic Surnames only
☐ Males only
☐ Females only
☒ Voters who Voted in the following Elections:
☒ Entire State ☐ Counties listed below only

Elections and Years:

General Election (11/07/2006; 11/04/2008; 11/02/2010; 11/06/2012; 11/04/2014; 11/08/2016)

A "suspense voter" is a voter known to have an incorrect or outdated address.

The county has sent the voter a form to obtain a new current address, but no response has been received. The voter is however, considered to be an active voter for voting purposes.

If the **entire state** is requested, mark the space provided. If a **district or county** is requested, list the district number or county (write "All" by the county name to indicate all precincts). Otherwise, for partial district, county or other requests, please list the county names and applicable precinct numbers.

COUNTY NAME(S) or DISTRICT NUMBER(S)

Check if entire State ☒

NOTE: For requests in addition to the options provided on this form, please email
elections@sos.texas.gov, as a data manipulation estimate may need to be provided for you.

For Internal Use Only	
First Reviewer: _____	Date reviewed: ____/____/____
Second Reviewer: _____	Date reviewed: ____/____/____
Completion date: ____/____/____	EFM: _____
	Date processed: ____/____/____

PUBLIC INFORMATION REQUEST FORM DETAILS AND INSTRUCTIONS

Send Order to:

Ron Williams, Policy Advisor

Presidential Advisory Commission on Election Integrity

1650 Pennsylvania Ave., NW, EEOB-Rm. 268, Washington, DC 20504

Telephone (202) **881-7807**

Send Statement to:

Kris L. Palmer, Program Analyst

General Services Administration

1800 F Street, N.W., Washington, DC 20405

Telephone (202) **501-0525**

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Please retain a copy of this form for your records. Please include a \$75.00 deposit fee with your request, made payable to the Secretary of State's Office. The Secretary of State will furnish the information not later than the 15th day after the date the request is received. Your order will not be released until full payment is received. The attached affidavit must be signed before a notary public and accompany all requests.

If you have any questions, please contact Elections Division at (512) 463-5650 or toll free at 1-800-252-VOTE (8683).

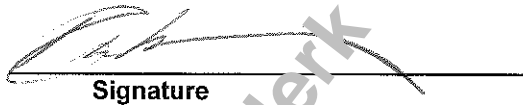
Affidavit

~~THE STATE OF TEXAS~~ District of Columbia: SS

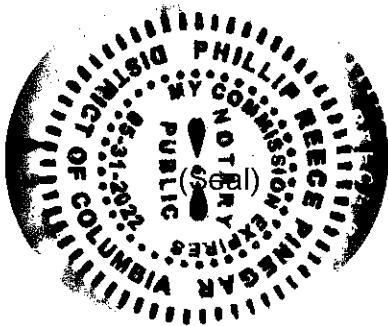
~~COUNTY OF~~ _____

Before me, the undersigned authority, on this day personally appeared
Ron Williams _____, who being duly sworn, deposes and says:

I do solemnly swear that the information obtained from the copy of the State Master
Voter File will not be used to advertise or promote commercial products or services.


Signature

Sworn to and Subscribe before me, this the 13 day of Sept., 2017.




Notary Public in and for the ~~State of Texas~~
District of Columbia

Phillip R. Pinegar
Printed Name of Notary

My commission Expires: 5-31-2022

PLEASE BE ADVISED

§ 18.067. Unlawful Use of Master File Information

(a) A person commits an offense if the person uses information in connection with advertising or
promotion of commercial products or services that the person knows was obtained under Section 18.066.

(b) An offense under this section is a Class A misdemeanor.

Acts 1985, 69th Leg., ch. 211, § 1, eff. Jan. 1, 1986.

Amended by Acts 1997, 75th Leg., ch. 864, § 13, eff. Sept. 1, 1997.