IN THE UNITED STATES COURT OF APPEALS
FOR THE FIFTH CIRCUIT

No. 14-41126
USDC No. 2:13-cv-00193

In re: State of Texas, Rick Perry in his Official Capacity as Governor of Texas, John Steen in his Official Capacity as Texas Secretary of State, Steve McGraw,

Petitioners

Plaintiff-Respondents' Texas State Conference of NAACP Branches and Mexican American Legislative Caucus of the Texas House of Representatives Opposition to Petition for a Writ of Mandamus to the Southern District of Texas, Corpus Christi

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CERTIFICATE OF INTERESTED PERSONS PER
FIFTH CIRCUIT LOCAL RULES 26.1.1, 27.4 AND 28.2.1

(1) No. 14-41126; *In re: State of Texas, Rick Perry in his Official Capacity as Governor of Texas, John Steen in his Official Capacity as Texas Secretary of State, Steve McGraw*.

(2) The undersigned counsel of record certify that the following listed persons and entities as described in the fourth sentence of Rule 28.2.1 have an interest in the outcome of this case. These representations are made in order that the judges of this Court may evaluate possible disqualification or recusal.

Plaintiff-Respondents	**Counsel**
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Petitioners	
State of Texas Rick Perry in his Official Capacity as Governor of Texas John Steen in his Official Capacity as Texas Secretary of State Steve McGraw	Greg Abbott Daniel T. Hodge James D. Blacklock J. Reed Clay, Jr. Jonathan F. Mitchell Adam W. Aston Arthur C. D'Andrea Office of the Attorney General Austin, Texas

Plaintiff-Respondents Texas State Conference of NAACP Branches and the Mexican American Legislative Caucus of the Texas House of Representatives respectfully ask this Court to deny Texas' request that the injunction entered by the U.S. District Court for the Southern District of Texas be stayed.[1]

First, the equities weigh strongly against Texas. A stay would threaten the voting rights of thousands of registered voters who lack SB 14 ID and want to participate in the November 2014 election. In other words, the district court's findings establish that SB 14, if implemented in the upcoming election, will effectively shut the door to the polling place for thousands of Texas registered voters. This is a real, irreversible injury – once a vote is lost, it cannot be recovered. Texas, on the other hand, will not suffer any irreparable injury from a decision not to grant a stay since, pursuant to the injunction, the State will be required to implement the voter identification procedure in effect prior to SB 14. That procedure was used successfully in many elections (most recently, the November 2012 election), and is well-known and understood by voters and election officials alike.

Secondly, Texas has not shown a strong likelihood of success on the merits, as is required to obtain a stay. The district court determined, after a lengthy trial and based upon extensive and detailed factual findings, that Texas enacted SB 14,

[1] *See Nken v. Holder*, 556 U.S. 418, 434 (2009) (setting forth the standards for granting a stay).

at least in part, for the purpose of denying or abridging the right to vote of African Americans and Latinos. The district court also found that SB 14 violates Section 2 of the Voting Rights Act, 52 U.S.C. § 10301, unconstitutionally infringes on the right to vote, and functions as an unconstitutional poll tax. The district court determined that a very large number of registered voters – over 600,000 – lack the limited forms of photo ID permitted by SB 14, and thus are threatened with disenfranchisement by the implementation of this law.

The district court, therefore, enjoined Texas from implementing SB 14's voter identification requirements. As a result, Texas must revert to the State's pre-existing voter identification procedure, at least until the state Legislature has the opportunity to enact a new, substitute procedure if it should so desire. *See Miss. State Chapter, Operation PUSH v. Mabus*, 932 F.2d 400 (5th Cir. 1991).

SB 14 requires that voters present one of a limited set of government-issued photo ID in order to vote in person, and is the "strictest" photo ID law in the country. Slip op. at 20. Under the preexisting system, voters could use their voter registration certificate (mailed to every registered voter by county election officials) to identify themselves at the polls or, if the voter appeared to vote without his or her certificate, any of several forms of photo ID or non-photo ID.

I. The Equities Weigh Strongly in Favor of the District Court's Injunction

In *Purcell v. Gonzalez*, 549 U.S. 1 (2006), the Supreme Court addressed the considerations relevant to a court enjoining a challenged voting practice shortly before an election. At issue was a preliminary injunction issued by the Ninth Circuit against a new voter identification law enacted by Arizona.

The Court emphasized that, in deciding whether to issue (or stay) an injunction, courts must pay close attention to the "strong interest" that citizens have "in exercising the fundamental political right to vote." *Id.* at 4 (internal quotation marks and citation omitted). Accordingly, "the possibility that qualified voters might be turned away from the polls [due to a challenged voter ID law] would caution any district judge to give careful consideration to the plaintiffs' challenges." *Id.*

Here, Texas makes no attempt to argue that any meaningful percentage of the individuals who currently lack SB 14 ID will be able to obtain that ID in time for the upcoming election. Accordingly, these individual will "be turned away from the polls" if SB 14 is implemented. Furthermore, the district court's finding that SB 14 was enacted with a discriminatory purpose counsels strongly in favor of applying the district court's injunction to the upcoming election. "An official action . . . taken for the purpose of discriminating against Negroes on account of their race has no legitimacy at all under our Constitution or under the [Voting

Rights Act]." *City of Richmond v. United States*, 422 U.S. 358, 378 (1975). Texas, therefore, must make a strong showing to justify implementation of SB 14 in the November election.[2]

Texas asserts that its purposefully unconstitutional law should be allowed to continue in force so as to avoid confusion at the polls in the upcoming election. Yet Texas has offered no evidence that this is true.

Texas relies on the fact that the Supreme Court, in *Purcell*, vacated the Ninth Circuit's injunction, and essentially argues that the Court established a per se rule against the issuance of injunctions close to an election. However, the Court articulated no such rule and did not suggest that any such rule exists.[3] Instead, the Court concluded that the Ninth Circuit wrongly acted because that court made two procedural errors – it failed to defer to the factual findings of the district court (that a preliminary injunction was not warranted) and failed to justify its determination that an injunction should issue. Here, the opposite situation is presented: by

[2] In the past few weeks, two federal courts preliminarily enjoined state voting practices, and the Supreme Court stayed the injunctions. *League of Women Voters v. North Carolina*, 2014 WL 4852113 (4th Cir. Oct. 1, 2014), *stay granted*, 2014 WL 5026111 (Oct. 8, 2014); *Ohio State Conference of the NAACP v. Husted*, 2014 WL 4724703 (6th Cir. Sept. 24, 2014), *stay granted*, 2014 WL 4809069 (Sept. 29, 2014). However, neither the Fourth Circuit nor the Sixth Circuit found that the challenged voting practices were likely enacted with a discriminatory purpose (and neither case involved relief granted after a trial on the merits).

[3] There are many reasons why such a per se rule is ill advised. Any assessment of whether equity requires the issuance of an injunction necessarily requires a case-specific review of the relevant facts. In addition, a per se rule could allow legislators who wish to enact a discriminatory practice to game the system by enacting new restrictions close to an election thus insulating their action from injunctive relief.

denying the stay application, the Fifth Circuit would "give deference to the discretion of the District Court" and would avoid "conflicting orders" close to the November election. *Id.* at 4-5.

Furthermore, the specific circumstances present in this case demonstrate that the district court's injunction will not result in voter confusion and, in fact, will be a positive incentive for voter turnout. First, as noted above, the injunction returns Texas to a status quo implemented as recently as the November 2012 general election. The declarations from numerous election officials (for Dallas, Bexar, Travis, El Paso, and Presidio Counties, attached hereto as Exhibits A through E, respectively) demonstrate that they are ready, willing, and able to implement the voter ID law in effect prior to SB 14. Texas has submitted no declarations to the contrary. The return to the recent status quo also means that voters will have no difficulty understanding what the voter identification requirements will be for this election.

In addition, the nature of the change effected by the injunction is easy for voters to understand and for election officials to enforce. The principal change is to *add* more forms of ID for in-person voting; there are *no* forms of ID that are permissible under SB 14 that will be precluded from use. Thus, if a stay is not granted and an individual seeks to vote with SB 14 ID, that voter will cast a regular

ballot, and will not be harmed in any way.[4] Likewise, poll officials need only be provided with a revised list of the acceptable forms of identification, *i.e.*, SB 14 ID, the voter registration certificate, and pre-SB 14 forms of backup ID.

Lastly, the district court found that many voters still do not understand the photo ID requirements of SB 14, in large part because Texas has failed to properly educate the public about these requirements. Additionally, election administrators report (in the submitted declarations) that reverting to the pre-SB 14 law would cause less voter confusion and administrative burden than proceeding under SB 14.

The Supreme Court in *Purcell* also noted the relationship between voter identification laws and the issue of voter fraud. 549 U.S. at 4. Here, however, the district court found that voter impersonation fraud was almost nonexistent under the pre-SB 14 voter identification law. Therefore, requiring Texas to revert to that law does not raise any concern as to the integrity of Texas' electoral process.

II. Texas Has Failed to Show a Likelihood of Success on the Merits

Texas also has failed to demonstrate a strong probability of success on the merits regarding any of the violations found by the district court, and thus the requested stay should be denied for this reason as well.

As an initial matter, the district court's determinations of statutory and constitutional violations are based, to a very large extent, on that court's evaluation

[4] This could be made absolutely clear by tweaking the injunction to explicitly provide that SB 14 forms of identification continue to be valid.

of the evidence presented at trial and on the numerous findings of fact set forth in its Opinion. These findings are entitled to substantial deference from this Court. *See Thornburg v. Gingles*, 478 U.S. 30, 79 (1986) (Section 2 results findings); *United States v. Brown*, 561 F.3d 420, 432 (5th Cir. 2009) ("We review a finding of intentional discrimination in a § 2 vote dilution case for clear error."); *see also Village of Arlington Heights v. Metro. Hous. Dev. Corp.*, 429 U.S. 252, 265-68 (1977) (explaining fact-sensitive nature of intentional discrimination claims).

For purposes of this brief, Plaintiff-Respondents Texas NAACP and MALC address the district court's determination that SB 14 was enacted with a discriminatory purpose. We respectfully refer the Court to the briefs of other Plaintiff-Respondents regarding the other merits issues in this case.

The district court's finding of discriminatory purpose is based on its application of the precise factors deemed pertinent by the Supreme Court in *Arlington Heights*, and the overwhelming, and often undisputed, record evidence. Slip op. at 126-34.[5]

1. At the outset, Texas has a long history of discrimination in voting dating back to the 19th Century and continuing throughout the 20th Century.

[5] To prevail on a claim of discriminatory purpose, the evidence need only show that discriminatory purpose was one of the motivating factors; it need not be the sole, dominant, or primary purpose. *Arlington Heights*, 429 U.S. at 265. Discriminatory purpose may be proven by direct or circumstantial evidence, *id.* at 265-68, and does not require proof of invidious racial animus. *Garza v. County of Los Angeles*, 918 F.2d 763, 778 & n.1 (9th Cir. 1990) (Kozinski, J. concurring and dissenting), *cert. denied*, 498 U.S. 1028 (1991).

And this discrimination has persisted into the 21st Century as well – the Supreme Court found that Texas' 2003 congressional redistricting plan violated the Section 2 results standard and bore "the mark of intentional discrimination that could give rise to an equal protection violation," *LULAC v. Perry*, 548 U.S. 399, 440 (2006); in addition, the very same Legislature that passed SB 14 passed redistricting bills that were found to have been intentionally discriminatory by two different federal courts. Furthermore, Texas' attempt to justify SB 14 as an anti-fraud measure is suspect given that the State has a long history of enacting discriminatory voting practices based on the claim that they were necessary to stop voter fraud.

2. Texas is experiencing dramatic demographic changes, involving the exponential growth of the Latino population, which has resulted in Texas recently becoming a majority-minority State. In addition, voting patterns in Texas are highly polarized between minority and Anglo voters. Relying on expert testimony presented at trial, the district court found that these conditions led the supporters of SB 14 to enact legislation that would suppress minority votes. The district court also noted the substantial evidence of a "racially charged" atmosphere in the legislative session that passed SB 14.

3. The district count found a clear, aberrational sequence of legislative events leading to the passage of SB 14. Instead of seeking ways to compromise

and negotiate changes in proposed photo ID legislation to respond to minority legislators' concerns that the legislation would suppress minority votes, SB 14 proponents eliminated established procedural mechanisms that are designed to facilitate negotiation, and made successive iterations of the photo ID bill even stricter, ultimately passing the most stringent bill of its sort in the country with "unnatural" speed.

4. The principal legislative proponents of SB 14 understood that the new photo ID requirements would adversely impact minorities. The district court cited to various documentary and testimonial evidence, including a memo from the chief of staff to the Lieutenant Governor recognizing that the bill would bear more heavily on minority voters, and the testimony of a key legislative supporter of photo ID to the same effect (Rep. Smith).[6]

5. Knowing that SB 14 would adversely affect minority voters, legislative proponents resisted repeated requests by opponents that a detailed examination be conducted regarding the precise impact of a photo ID bill, even though the State had access to relevant data. The one study that was conducted by the

[6] Contrary to Texas' oft-repeated argument that, despite discovery of legislators' documents and depositions of legislators, plaintiffs found no evidence relevant to intent, the district court's opinion is replete with examples of such evidence. Texas seems to think that the only relevant evidence would be an express admission by a legislator that he or she intended to discriminate against minorities. As our courts have found, that is not to be expected: "[O]fficials acting in their official capacities seldom, if ever, announce on the record that they are pursuing a particular course of action because of a desire to discriminate against a racial minority. Even individuals acting from invidious motivations realize the unattractiveness of their prejudices . . . ." *Smith v. Town of Clarkton*, 682 F.2d 1055, 1064 (4th Cir. 1982).

Secretary of State's office in 2011, prior to the passage of SB 14, was suppressed.

6. Finally, as found by the district court, SB 14 proponents kept shifting their rationales for enactment of a photo ID bill, and sought to justify enactment with unsustainable reasons. Proponents claimed that SB 14 is necessary to stop voter fraud, but the Legislature was informed that the existing voter ID law had made voter impersonation at the polls virtually non-existent. Proponents claimed that SB 14 is necessary to stop non-citizens from voting but SB 14 allows forms of ID obtainable by non-citizens. Proponents publicly claimed that SB 14 is modeled after Georgia's and Indiana's photo ID laws but privately acknowledged that SB 14 is significantly stricter. Finally, SB 14 includes restrictions that bear no relationship to the asserted purpose of specifying the types of photo ID that demonstrate identity, such as the SB 14 requirement that only current or recently expired government ID may be utilized. In short, "the factors usually considered important by the decisionmaker[s] strongly favor[ed] a decision contrary to the one reached." *Arlington Heights*, 429 U.S. at 267.

III. Conclusion

For these reasons, and for the reasons set forth in the opposition briefs filed by the other Plaintiff-Respondents, Texas NAACP and MALC, urge this Court to deny the motion for a stay.

Date: October 12, 2014

Respectfully submitted,

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Counsel for Plaintiff-Respondents Texas State Conference of NAACP Branches, Mexican American Legislative Caucus of the Texas House of Representatives

CERTIFICATE OF SERVICE

I certify that a true and correct version of the foregoing was filed with the clerk of the court by email, and served upon counsel of record in this case by email on October 12, 2014.

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Exhibit A

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)
(Consolidated Action)

DECLARATION OF ANTOINETTE 'TONI' PIPPINS-POOLE

Pursuant to 28 U.S.C. §1746, I declare that:

1. My name is Antoinette "Toni" Pippins-Poole. I am the Elections Administrator for Dallas County. My duties include the administration of elections and maintenance of election and voter registration records. I have held my current position since 2011. Before holding my current post I was the Assistant Election Administrator for Dallas County for 23 years. January will mark my 26th year of professional experience in elections.
2. Upon learning that the U.S. District Court for the Southern District of Texas would enjoin SB 14, the TX photo ID bill, my office immediately took the following steps to comply with the court's order: Starting October 10, 2014, my office initiated various communications to election workers, the media, and members of the public informing them that SB 14 would be enjoined for this election and that a photo ID may not be required to vote in the upcoming election. Our office has conducted two training classes for election workers wherein we communicated the same and provided instruction on pre-SB14 as well as SB 14 election procedures and requirements. We have several more classes scheduled. Our training instructions are that the voter ID provisions that have been in effect for many years prior to SB 14 being implemented (i.e. the pre-SB 14 ID requirements) may be in use once again in this election. The vast majority of poll officials are very familiar with these requirements because they were in effect for many years and many poll officials administered past elections when these requirements were in effect. In addition, we saved Dallas County's voting forms and training materials that were used prior to SB 14's implementation in 2013, and we did so in case SB 14 was

enjoined. Our early voting and Election Day supply kits for election judges are being prepared for use of these forms and materials in connection with the upcoming election.

3. From talking with poll officials in my County, and having gone through several low turnout elections with SB 14 in effect, it is my opinion that there has been much confusion regarding the implementation of SB 14 and what photo IDs could be used at the polls. Some voters have been turned away or have been required to vote a provisional ballot because they lack the proper Identification even though they are duly registered voters in the County. Provisional ballots are required to be rejected if the voter fails to present SB 14 identification within six days at the Dallas County Election Office. For some voters our office is more than 30 miles away from their voting location. In addition, at training sessions held for elections administrators and poll officials over the last year, many of those poll workers have expressed confusion about the new photo ID requirements, especially with regard to expired driver's licenses, military identification and the different types of available exemptions.
4. Based on my experience with pre and post SB 14 requirements, my familiarity with the concerns of poll workers regarding what is and is not acceptable SB 14 identification, my familiarity with the concerns voiced by county voters and my decades long experience administering elections I believe that it will be less confusing and less chaotic for voters and poll officials alike if we use the pre-SB 14 ID requirements in the upcoming election. I believe that without the injunction of SB14 there will be more confusion for election officials and voters in part because based on historical patterns we are expecting this to be a higher turnout election. The implementation of SB 14 to date has caused confusion among voters and precinct level election officials. Returning to the voter identification requirements in place prior to SB 14 will result in much less confusion than SB14 in part because most of the workers in Dallas County have conducted more elections under pre SB 14 requirements and fewer voters, less than 12 percent have voted under SB14. Because Dallas County has only 30 early voting locations, we would easily be able to communicate the requirements to the polling judges prior to the start of early voting.
5. My office has communicated with several media outlets, including broadcast and print. Based on my understanding of the Court Order I informed these outlets that Dallas County will return to pre-SB 14 requirements for this upcoming election.
6. My office is in the process of distributing a mass mailing that will, among other things, inform the public that the photo ID requirements under SB 14 may not be in effect for the upcoming elections and reminding and educating individuals about pre-SB 14 requirements. Additionally, our website has already been updated to announce the same.
7. Since SB 14 went into effect last year, we have received inconsistent and confusing information about the photo law and its implementation. For example, just last week, a supervisor in our elections office noticed that the Secretary of State's office sent around training materials that incorrectly suggested that certain forms of veterans' identification lacked expiration dates. Because he is a veteran, he knows that these veterans' IDs actually have expiration dates. After he contacted the Secretary of State's office about this, the SOS office promised to look into the matter. However, the training materials sent out statewide by the SOS are erroneous on this point.
8. Based on my extensive experience with the administration of elections and familiarity with the difficulties that have been imposed on the election process by SB 14 requirements, I believe that it would be far easier for voters and poll officials to

administer effectively the upcoming elections for Dallas County using the pre-SB 14 requirements instead of SB 14's photo ID requirements. It is also the case that more voters would be disenfranchised in Dallas County if SB 14 were allowed to be in effect for the upcoming elections.

I declare under penalty of perjury that the foregoing is true and correct.

Dated this 11th day of October, 2014.

_/s/_ Antoinette "Toni" Pippins-Poole _____
Dallas County Election Administrator

Exhibit B

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)
(Consolidated Action)

DECLARATION OF JACQUELYN F. CALLANEN

Pursuant to 28 U.S.C. §1746, I declare that:

1. My name is JACQUELYN F. CALLANEN. I am the Election Administrator for Bexar County. I have held this position for over 9 years. I am aware the United States District Court for the Southern District of Texas, Corpus Christi Division, has entered an injunction against SB 14.
2. It would be far easier for voters and poll officials to administer effectively the upcoming elections for Bexar County using the pre-SB 14 requirements instead of SB 14's photo ID requirements.
3. Even though we have implemented SB 14 for the last few elections, we have had such a small voter turnout in these elections that the requirements of SB14 are still new for the vast majority of citizens.

I declare under penalty of perjury that the foregoing is true and correct.

Dated this 11th day of October, 2014.

/s/ JACQUELYN F. CALLANEN
Bexar County Administrator

Exhibit C

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)
(Consolidated Action)

DECLARATION OF DANA DEBEAUVOIR

Pursuant to 28 U.S.C. §1746, I declare that:

1. My name is Dana Debeauvoir. I am the County Clerk and Election Administrator for Travis County. I have held this position for almost 28 years.
2. Since SB 14 went into effect last year, we have received inconsistent and confusing information about the photo ID law and its implementation. For example, the instructions have been inconsistent on how to handle discrepancies in a voter's name when it appears differently on the voter roll than on the SB 14 approved ID, e.g., married women.
3. I agree with the Texas Secretary of State's Election Administrator, Keith Ingram's statement that Texas's implementation of SB14 has resembled building an airplane while trying to fly it.
4. It would be far easier for voters and poll officials to administer effectively the upcoming elections for Travis County using the pre-SB 14 requirements instead of SB 14's photo ID requirements. I believe It is also the case that more voters would be disenfranchised in Travis County if SB 14 were allowed to be in effect for the upcoming elections.

I declare under penalty of perjury that the foregoing is true and correct.

Dated this 11th day of October, 2014.

_/s/_ Dana DeBeauvoir_____
Travis County Clerk

Exhibit D

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)
(Consolidated Action)

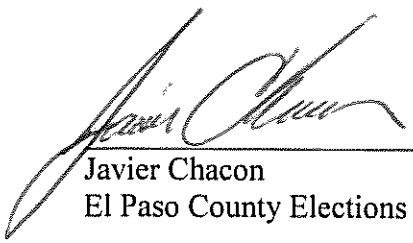
DECLARATION OF JAVIER CHACON

Pursuant to 28 U.S.C. §1746, I declare that:

1. My name is JAVIER CHACON. I am the Elections Administrator for El Paso County, Texas. I have held this position since January 2008 and have worked in the El Paso County Elections Department for approximately 31 years. I am aware the United States District Court for the Southern District of Texas, Corpus Christi Division, has entered an injunction against SB 14.
2. I anticipate there will be many more voters for the upcoming 2014 election than in recent elections, including many first time voters.
3. We have taken steps to implement the requirements of SB14, but I am concerned that many voters are still not adequately familiar with the requirements of SB14.
4. It would be far easier for voters and poll officials to effectively administer the upcoming elections for El Paso County using the pre-SB 14 requirements instead of SB 14's photo ID requirements.

I declare under penalty of perjury that the foregoing is true and correct.

Dated this 11th day of October, 2014.



Javier Chacon
El Paso County Elections Administrator

Exhibit E

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

MARC VEASY, et al.,

Plaintiffs

v.

CIVIL ACTION NO. 2:13-CV 193 (NGR)
(Consolidated Action)

RICK PERRY, et al.,

Defendants

DECLARATION OF VIRGINIA PALLAREZ

Pursuant to 28 U.S.C. §1746, I declare that:

1. My name is Virginia Pallarez. I am competent in all respects to make this Declaration. I am the Election Administrator for Presidio County. I am aware the United States District Court for the Southern District of Texas, Corpus Christi Division, has entered an injunction against SB 14.

2. It would be far easier for voters and poll officials to administer effectively the upcoming elections for Presidio County using the pre-SB 14 requirements instead of SB 14's photo ID requirements.

3. Even though we have implemented SB 14 for the last few elections, the requirements of SB 14 are still new for the vast majority of citizens.

I declare under penalty of perjury that the foregoing is true and correct.

Dated this 12th day of October, 2014.

Virginia Pallarez
Presidio County and District Clerk