

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

TEXAS DEMOCRATIC PARTY; §
BOYD L. RICHIE, in his capacity as §
Chairman of the Texas Democratic Party; §
HARRIS COUNTY DEMOCRATIC §
PARTY; GERALD BIRNBERG, in his §
capacity as Chairman of the Harris §
County Democratic Party; J. §
GOODWILLE PIERRE; ALEXANDRA §
GIBBS; JEFFREY T. §
VANSCHOONHOVEN; BONI SUE §
LESZCZUK; and ERIC J. GALLOWAY §

Plaintiffs,

vs.

LEO VASQUEZ, in his capacity as §
Harris County Tax Assessor Collector §
and Harris County Voter Registrar §

Defendant.

Cause No. 4:08-CV-03332

PLAINTIFFS' BRIEF IN SUPPORT OF PLAINTIFFS'
MOTION TO COMPEL DISCOVERY RESPONSES
AND RESPONSE TO DEFENDANT'S REPORT

TO THE HONORABLE JUDGE GRAY MILLER:

COME NOW Plaintiffs, TEXAS DEMOCRATIC PARTY, BOYD L. RICHIE, in his capacity as Chairman of the Texas Democratic Party, HARRIS COUNTY DEMOCRATIC PARTY, GERALD BIRNBERG, in his capacity as Chairman of the Harris County Democratic Party, J. GOODWILLE PIERRE, ALEXANDRA GIBBS, JEFFREY T. VANSCHOONHOVEN, BONI SUE LESZCZUK, and ERIC J.

GALLOWAY (hereinafter collectively referred to as “Plaintiffs”), and files this their Brief in Support of Plaintiffs’ Motion to Compel Discovery Responses and Response to Defendant’s Report and in support thereof would show the following:

I. Issue

May the Defendant withhold information in the public voter registration database reflecting rejected voter registration applications and removed registered voters when federal statutes and case law require its disclosure, and when evidence exists that voter registration applications were rejected wrongfully?

May the Defendant require redaction of these documents when the Texas Attorney General has ruled redaction of voter registration records is not necessary?

II. Background

The Defendant admits that almost 70,000 voter registration applications were rejected during the months leading up to the last federal general election and has failed to make available the substantive documents concerning these rejected applications. The Defendant further admits that more than 200,000 people were removed from the voter rolls during this period and has failed to make available the substantive documents concerning these removed voters.

Responses from the Texas Secretary of State to a Deposition on Written Questions reveals rejection rates over the same time period in other counties (with Republican and Democratic election officials) are overwhelming less than the rejection rate recorded in Harris County:

COUNTY	RECEIVED	REJECTED
Dallas County	451,238	1,183
Tarrant County	173,622	10,470
Bexar County	273,998	7,001
El Paso County	97,555	4,082
Jefferson County	14,800	14

See Exhibit “A.”

Depositions have demonstrated that Ed Johnson, the public employee charged with administering the County’s voter database is centrally involved in the processing of voter registration applications, removal of names from voter rolls, and processing provisional ballot affidavits to make a recommendation to the Ballot Board as to whether those provisional ballots should be tabulated. *See* Exhibit “B.” Ed Johnson is also a director of a private entity known as Campaign Data Systems. *See* Exhibit “C.” Campaign Data Systems charges Republican candidates a fee for registered voter information. *See* Exhibit “D.”

Another individual associated with Campaign Data Systems, Republican State Representative Dwayne Bohac sponsored a state law in 2005 (HB1268) that did not specifically require, but which was subsequently used by, the Defendant to deny voter registration applications of a person who provides their social security number instead of a drivers license. *See*

<http://www.legis.state.tx.us/BillLookup/History.aspx?LegSess=79R&Bill=HB1268>

(accessed June 11, 2009).

Federal law (42 U.S.C.A. § 1973gg-7(b)) requires the registration of such applications and The Materiality Provision of the Voting Rights Act (42 U.S.C.A. 1971(a)(2)(B)) requires a voter be registered when sufficient information is provided to confirm the person is eligible to vote.

The evidence produced to date reveals the Defendant denies voter registration applications for a variety of unlawful reasons. Plaintiffs are not yet aware of all such activities and therefore mediation is premature.

Though it is true the Defendant has produced thousands of pages of documents, these documents are mostly internal policies and procedures, memoranda, e-mails, and correspondence. Very little information produced to date is actual substantive voter registration documents and even the documents produced are nowhere near complete – a fact the Defendant admits.

THE CD CONTAINS LITTLE INFORMATION

The CD produced by the Defendant this day is, as predicted by Plaintiffs' counsel, primarily useless information. It merely contains approximately 500 images of documents and computer images, many of which have already been produced. Most of the computer images are illegible.¹ None of the images would allow Plaintiffs to review the application and the other substantive documents for a prospective voter to determine if their application was properly rejected. None of the images would allow Plaintiffs to determine how provisional ballot affidavits were processed and if it complied with

¹ Interestingly, many of the images contain dates of birth.

federal or state law. None of the images would allow Plaintiffs to determine if approximately 200,000 voters were properly removed from the voter rolls. The CD does contain, for the first time, lists of voters purged or cancelled and a code for the reason for the removal. The CD also contains for the first time names of applicants rejected and the alleged reasons. However, almost no substantive documentation has been produced that would allow Plaintiffs to confirm if voter registrations have been properly rejected or whether registered voters have been properly deprived of the elective franchise. The entire database with all images and data fields would be required for this review.

Plaintiffs have shown that the voter registration policies of the Defendant are, at a minimum, suspect and the Plaintiffs are entitled, with proper Court supervision, to inspect the public records in the least expensive and time consuming manner.

III. Argument

I. DISCLOSURE OF VOTER REGISTRATION RECORDS IS MANDATORY UNDER THE NVRA, AND NOT SUBJECT TO COURT DISCRETION OR LIMITATION OF SCOPE.

Central to public oversight of state voter registrar activities is the ability of interested parties to examine voter registration records, especially regarding the names of those persons removed from the voter rolls. As a result, the NVRA expressly mandates public access to **all** such records, without condition, save that the inspecting party may have to pay for photocopying at a “reasonable cost” if copies are desired:

(i) Public disclosure of voter registration activities

(1) Each State shall maintain for at least 2 years and shall *make available for public inspection* and, where available, photocopying at a reasonable cost, **all records** concerning the implementation of programs and activities conducted for the purpose of ensuring the accuracy and currency of official lists of eligible voters. . . .

(2) The records maintained pursuant to paragraph (1) *shall include* lists of the names and addresses of all persons to whom notices described in subsection (d)(2) [concerning the removal of names from voting rolls] of this section are sent, and information concerning whether or not each such person has responded to the notice as of the date that inspection of the records is made.

42 U.S.C.A. § 1973gg-6(i) (emphasis added).

It is important to note that the public inspection mandated contained in Section 1973gg-6(i) applies to the “public” at large – certainly “aggrieved” person plaintiffs litigating an injury related to disenfranchisement of their constitutionally-guaranteed right to vote enjoy even greater access to the very documentation and records necessary to identify the scale and scope of alleged state voter registrar malfeasance. Absent full access to such voter registration records, the malfeasance registrar could, through subterfuge and claims of confidentiality, defeat any meaningful civil enforcement of fair and impartial voter registration pursuant to the very purposes of the NVRA: to protect the integrity of the electoral process, ensure that accurate voter registration rolls are maintained. 42 U.S.C.A. § 1973gg(b).

Indeed, plaintiffs investigating wrongdoing regarding voter registration methodology are afforded unconditional access to all relevant voter registration records, outside the normal rules of civil procedure for discovery requests. Under the United

States Code provision governing access to federal election records, litigants such as the Attorney General (and, necessarily “aggrieved” person plaintiffs as well) are to be produced without condition:

Any record or paper required by section 1974 of this title to be retained and preserved *shall, upon demand in writing* by the Attorney General or his representative directed to the person having custody, possession, or control of such record or paper, *be made available for inspection, reproduction, and copying* at the principal office of such custodian by the Attorney General or his representative. This demand shall contain a statement of the basis and the purpose therefore.

42 U.S.C.A. § 1974b (emphasis added). United States District Courts have exclusive jurisdiction to compel, through appropriate process, custodians of federal election records to produce them if the custodian fails to comply with the Section 1974b demand. Case law construing these provisions have held that the normal rules of federal civil procedure do not apply, the demand for production is mandatory, and the custodian of the records cannot impose conditions inspection by the litigant. Though Section 1974(b) applies only the Attorney General, the statute is worded similar to 1973gg–6(i), and therefore cases considering 1974(b) are applicable. Thus, it has been held that a district court lacks the discretion to limit the Attorney General’s Section 1974b demand by (1) limiting the scope of production to specific time frames, or (2) to inspection solely of qualified voters, because investigation of malfeasant voter registration practices necessitates that the requester be allowed “an opportunity to inspect the records as to those who may have been illegally denied the right to qualify . . . [as that] is really what the investigation is all

about.” *Kennedy v. Lewis*, 325 F.2d 210, 211-12 (5th Cir. 1963), *cert. denied* 371 U.S. 952 (1963).

The policy concern addressed by the relaxed production standards afforded to plaintiffs investigating violations of federal election law is so as to assure that the plaintiff be granted access sufficient to adequately investigate the alleged malfeasance. The Attorney General asserting access to voter records under 42 U.S.C.A. § 1974b “is entitled to have an order of the trial court authorizing it to inspect the voting records . . . upon the simple assertion . . . that there are reasonable grounds for belief that certain voters are being discriminatorily denied their voting rights in a given county.” *U.S. v. Lynd*, 301 F.2d 818, 822 (5th Cir. 1962). There is no justification for treating Plaintiffs in this case any differently.

As more fully explained in detail by the Fifth Circuit Court of Appeals:

[W]e emphasize . . . that the filing of the application by the Attorney General is not the commencement of an ordinary, traditional civil action with all of its trappings. It is, however, comparable to the form of a traditional order to show cause, or to produce in aid of an order of an administrative agency. . . .

But this is not, we repeat, the ordinary civil action. It is a special statutory proceeding in which the courts play a limited, albeit vital, role. In words adopted as our own, we said that Title III provides ‘an effective means whereby preliminary investigations of registration practices can be made in order to determine whether or not such practices conform to constitutional principles.’ *State of Alabama ex rel. Gallion v. Rogers*, D.C., 187 F.Supp. 848, 853. Relying on the principles expounded in *Hannah v. Larche*, 1960, 363 U.S. 420, 80 S.Ct. 1502, 4 L.Ed.2d 1307, we translated them effectively in specific terms of a Title III proceeding. ‘Here the function sought to be exercised by the Attorney General is- as in *Hannah*-

purely investigative.’ *State of Alabama ex rel. Gallion v. Rogers*, D.C., 187 F.Supp. 848, 854.

Since it is a special statutory proceeding, it does not require pleadings which satisfy usual notions under the Federal Rules of Civil Procedure. All that is required is a simple statement by the Attorney General that after a § 1974b written demand for inspection of records and papers covered in § 1974, the person against whom an order for production is sought under § 1974d has failed or refused to make such papers ‘available for inspection, reproduction, and copying * * *.’

There is no place for a motion for a bill of particulars or for a more definite statement under F.R.Civ.P. 12(e). There is no place for any other procedural device or maneuver- either before or during any hearing of the application- to ascertain the factual support for, or the sufficiency of, the Attorney General’s ‘statement of the basis and the purpose therefore’ as set forth in the written demand. § 1974b. Thus with respect to the reasons why the Attorney General considers the records essential, there is no place, either as a part of pleadings, discovery, or trial, for interrogatories under F.R.Civ.P. 33, oral depositions of a party under F.R.Civ.P. 26(a), 30, production of documents under F.R.Civ.P. 34, or request for admissions as to facts or genuineness of documents or other things under F.R.Civ.P. 36, 37. The same is true as to the nature, kind or specification of the records and papers sought, the names, identities or addresses of persons thought to have received discriminatory treatment, whether favorable or adverse, and the like.

On the filing of this simple statement by the Attorney General, the Court is required to treat it as a summary proceeding. The Court, with expedition, should grant the relief sought or, if the respondent-custodian opposes the grant of such relief, the matter should be set down without delay for suitable hearing on the matters open for determination. These are, of course, severely limited. In the event of a genuine dispute thereon, it would be in order for the Court to determine whether the written demand has been made, § 1974b, or whether the custodians against whom orders are sought have been given reasonable notice of the pendency of the proceeding. On the other hand, the factual foundation for, or the sufficiency of, the Attorney General’s ‘statement of the basis and the purpose’ contained in the written demand, § 1974b, is not open to judicial review or ascertainment. Nor is the scope of the order to produce insofar as it concerns the nature of the records or papers. This is so because **the papers**

and records subject to inspection and demand have been specifically identified by Congress. The Attorney General is entitled to have made available for his ‘inspection, reproduction and copying’ in the custodian's office ‘**any record or paper**’ which § 1974 requires ‘to be retained and preserved.’ **The incorporated standard of § 1974 is sweeping.** . . .

...

The right of the Attorney General to secure judicial enforcement of the written demand § 1974b, is not affected in any way by the pendency of a § 1971 case or **the right of discovery in such case under the Federal Rules of Civil Procedure. The two proceedings are distinct and distinctively separate.**

Kennedy v. Lynd, 306 F.2d 222, 225-27 (5th Cir. 1962) (emphasis added), *cert. denied* 371 U.S. 952 (1963).

Under a related Code section, the federal election records received under Section 1974b cannot be disclosed, except in court or to Congress, thereby assuring that the information contained therein is not disclosed publicly. 42 U.S.C.A. § 1974c. Plaintiffs have agreed to be bound by these terms and any additional terms stated in a protective order.

This Court, under the statutes, does not have discretion to deny Defendant's production of the federal election records, or limit its scope. As a result, this Court should compel Defendant to grant Plaintiffs full and unconditional access to the County voter registration databases.

II. PLAINTIFFS' DEMAND FOR PRODUCTION OF VOTER REGISTRATION RECORDS WAS MADE PURSUANT TO FEDERAL ELECTION LAWS AND THEREFORE THIS REQUEST IS NOT SUBJECT TO DISCLOSURE RESTRICTIONS IMPOSED BY STATE OPEN RECORDS LAWS.

Defendant has advanced four primary arguments against complying with Plaintiffs' request to gain access to the Harris County voter registration databases: (1) Plaintiffs' request is not specific enough and amounts to a discovery "fishing expedition"; (2) Defendant has already substantially complied with the request; (3) sensitive and confidential information appears in the records, information which Defendant must redact prior to release to Plaintiffs to protect the voters' right of privacy; and (4) Plaintiff must agree to pay Defendant a sum estimated at \$1,597,282.73 to cover estimated costs for copying and redacting each page of the requested records. (Letter from Andy Taylor to Rhonda Moore-Konieczny, May 26, 2009 at 1-2.) However, each of these arguments are demonstrably meritless, because they reference state law open records standards, whereas in the instant case, Plaintiffs have sought to compel disclosure of the requested voter registration records pursuant to the National Voter Registration Act of 1993 ("NVRA"), 42 U.S.C.A. § 1973gg - 1973gg-10 (current through P.L. 111-25, approved Jun. 2, 2009) and the Voting Rights Act.

Among the stated purposes of the NVRA are: (a) to establish procedures that will increase the number of eligible citizens who register to vote in elections for federal office; (b) to protect the integrity of the electoral process; and (c) to ensure that accurate

and current voter registration rolls are maintained. 42 U.S.C.A. § 1973gg(b)(1),(3),(4). affirmed as modified 56 F.3d 791.

Under the NVRA, two entities possess standing to enforce the stated purposes of the Act (i.e., increasing the number of eligible voters, assuming the integrity of the electoral process, and ensuring the accuracy of state registration rolls): (1) the United States Attorney General, 42 U.S.C.A. § 1973gg-9(a); and (2) any “person who is aggrieved by a violation” of the Act, *id.* § 1973gg-9(b). The countenanced “aggrieved” persons who may enforce compliance with the strictures of the NVRA include political parties and organizations who represent and advocate for their individual members’ right to vote. *See, e.g. Charles H. Wesley Educ. Found., Inc. v. Cox*, 408 F.3d 1349 (11th Cir. 2005) (charitable and educational organization had a legally protected interest to assure the registration of submitted voter registration forms, and thus, the organization possessed standing to sue under the NVRA); *Miller v. Blackwell*, 348 F.Supp.2d 916, 920-21 (S.D.Ohio 2004) (“Plaintiff Ohio Democratic Party has standing to bring this case [under the NVRA] on its own behalf and on behalf of its members” where it was alleged that state voter registration practices would render certain persons ineligible after “a non-forwardable mailing . . . sent to each of the voters from the Ohio Republican Party was returned”), *stay denied* 388 F.3d 546; *accord Sandusky County Democratic Party v. Blackwell*, 387 F.3d 565, 573-74 (6th Cir. 2004) (political party and labor unions held to possess standing to assert the rights of their individual members, objecting to state

provisional ballot directive) (construing Help America Vote Act, 42 U.S.C.A. § 15301 et seq.).

A. All Conditions Precedent For Release of the Records Have Been Met.

No mandatory condition precedent to an “aggrieved” person’s right to initiate a civil enforcement action under the NVRA exists. A plaintiff “may” supply prior notice of the violation to the chief election official of the State involved. 42 U.S.C.A. § 1973gg-9(b). However, failure of a NVRA plaintiff to supply such notice is not detrimental to the plaintiff’s action. “Although . . . plaintiffs . . . failed to provide notice, their suits will not be dismissed on that ground. . . . Congress structured the notice requirement . . . [to] provide states in violation of the Act an opportunity to attempt compliance before facing litigation.” *Assoc. of Cmty. Org.s for Reform Now v. Miller*, 129 F.3d 833, 838 (6th Cir. 1997).

Here, Plaintiffs supplied Defendant with the notice countenanced under Section 1973gg-9(b). The NVRA imposes no additional conditions precedent upon right of action under the Act.

Defendant erroneously contends that Plaintiffs have no right of access to the voter registration records until Plaintiffs: (1) clarify what information they require, (2) agree to pay nearly \$1.6 million in redaction and copying fees, and (3) agree that certain information must be redacted from the records prior to release, despite the unconditional public disclosure mandate found at Subsection 1973gg-6(i). Defendant’s contention that

Plaintiffs must engage in any additional conduct prior to access to the voter registration records is meritless.

B. State Law Open Records Law Cost-Allocation Standards Are Pre-empted By Federal Statutes To The Contrary.

The plain language of the federal voter registration records disclosure provision reveals that, if required, states complying with NVRA records access requests may, if the facilities exist, charge inspecting persons for “photocopying at a reasonable cost”. 42 U.S.C.A. § 1973gg-6(i)(1). Importantly, the statute does not state that persons inspecting voter registration records must purchase photocopies from the custodian, only that where desired by the inspector, and available at the records depository, the custodian may assess a reasonable fee for photocopying. Also, the statute limits the charges to “photocopying.” Missing is any language placing the burden of record preparation (such as collation, collection, redaction, etc . . .) upon the inspector – therefore, any costs, aside from photocopying where requested by the inspector, must be borne by the custodian and the state. The statute clearly mandates inspection without charge.

Furthermore, in this action, photocopying is not necessary, because (1) Plaintiffs can provide their own copying technology, and (2) the records are computerized, and a copy of the voter registration records in electronic format would be acceptable and more cost effective anyway. *See, e.g. Schulz v. N.Y. State Bd. of Elections*, 633 N.Y.S.2d 915, 923 (Sup. Ct. 1995) (“Where the record is a computerized record the charge shall be limited to the cost of a diskette or other computerized tape and a reasonable amount for

the salary of the employee downloading said diskette or tape during the time such diskette or tape is being downloaded.”); *Hessley v. Campbell*, 751 A.2d 1211, 1214 -15 (Pa. Commw. Ct. 2000) (holding that where a political party requested electronic copies of voter registration records, where the custodians sought to charge \$300.00 for downloading the information onto the requester’s own disks, this charge was unreasonably excessive, given the “minimal” time it takes to copy electronic files to media).

It is a fundamental rule of statutory construction that statutory text is not to be construed to encompass more than what it explicitly states. Under the doctrine of *express mention, implied exclusion*, the appearance of an item in a statutory list necessarily implies the purposeful exclusion of any items left out of the list. “The doctrine of *inclusio unius est exclusio alterius* informs a court to exclude from operation those items not included in a list of elements that are given effect expressly by the statutory language.” *Robinson v. Napolitano*, 554 F.3d 358, 365 (3d Cir. 2009) (internal quotations and citations omitted). Only one category of access cost is expressly billable to the inspecting public under the statute: photocopying costs, and only if requested by the inspector. Absent statutory language allowing charges for document preparation, such as collation, collection, transfer of format, redaction, etc . . . , such expenses cannot be assessed upon the inspecting public under NVRA Section 1973gg-6(i)(1). To hold otherwise would violate well-settled law of statutory construction, and add requirements that Congress never intended.

Defendant claims that the Texas Open Records laws dictate that Plaintiffs bear the burden of document preparation and redaction costs, if such work is performed, but this assertion ignores the facts that (1) Plaintiffs are not claiming access to the voter registration records through state law, but through Section 1973gg-6(i)(1) of the NVRA, and (2) where state laws conflict with federal statutory requirements, the federal laws control under principles of supremacy. “[W]hen a state law conflicts with federal law, it is pre-empted and has no effect.” *BIC Pen Corp. v. Carter*, 251 S.W.3d 500, 504 (Tex. 2008).

[A] federal statute implicitly overrides state law either when the scope of a statute indicates that Congress intended federal law to occupy a field exclusively, or when state law is in actual conflict with federal law. We have found implied conflict pre-emption where it is impossible for a private party to comply with both state and federal requirements, or where state law stands as an obstacle to the accomplishment and execution of the full purposes and objectives of Congress.

Dallas Area Rapid Transit v. Amalgamated Transit Union Local No. 1338, 273 S.W.3d 659, 669 (Tex. 2008) (quoting *Freightliner Corp. v. Myrick*, 514 U.S. 280, 287(1995)).

Therefore, Plaintiffs are not bound by state law open records policies concerning assessment of access costs to the extent that such state requirements conflict with NVRA Section 1973gg-6(i)(1)’s mandate that the sole cost assessable against inspectors is the actual cost of photocopying, where the persons accessing records under this statute request photo static copying of the documents.

C. State Law Requirements Regarding Redaction of Confidential Information Do Not Apply to The Present Facts, and Are Pre-empted.

Furthermore, Defendant strenuously argues that the Voter Registrar is duty-bound to redact private and confidential information from the requested records, pursuant to mandates under the Texas Open Records laws. Again, contrary state rules regarding release of various categories of information are trumped by federal law to the contrary. The NVRA statutory provision governing public access to voter registration records is expressly inclusive, and supplies only two enumerated exceptions:

Each State shall . . . make available for public inspection . . . **all records** . . . , *except* to the extent that [1] such records relate to a declination to register to vote or [2] to the identity of a voter registration agency through which any particular voter is registered.

42 U.S.C.A. § 1973gg-6(i) (bracketed numbering and emphasis added). No exceptions are expressly enumerated other than information pertaining to: (1) a person's refusal to register, or (2) the link between individual voters and voter registration agencies. Had Congress wished to deny access to other information contained in the voter registration files, then they would have enumerated them as exempted information as well. Under the doctrine of *inclusio unius est exclusio alterius* discussed *supra*, no additional exceptions to the information that must be released may properly be implied here. Also, federal pre-emption of contrary state law defeats any argument advanced by Defendant that state law somehow controls right of access to records mandated as accessible pursuant to federal law.

Even if the state open records laws did control here, which they clearly do not, Defendant's argument is untenable. Defendant claims, for instance, that social security

numbers and driver's license information "[are] confidential by law." (Letter from Andy Taylor to Rhonda Moore-Konieczny, May 26, 2009 at 2.) However, this characterization is simply not true. Even the Texas Public Information Act provision cited by Defendant as stating that social security numbers are confidential states the opposite. While the Defendant's attorney stated that Plaintiffs' request seeks "certain items of information that are clearly . . . confidential under the Public Information Act . . . [such as] [a]n individual's social security number (§ 552.147)" (Letter from Mike Stafford to Chad W. Dunn, Aug. 14, 2008 at 1), reference to the cited statute reveals the flaw in this argument:

The social security number of a living person is excepted from the requirements of Section 552.021, *but is not confidential under this section* and this section *does not make the social security number* of a living person *confidential under* another provision of this chapter or *other law*.

Tex. Gov't Code § 552.147(a) (emphasis added). This provision expressly states that social security numbers are not "confidential", but merely excepted from disclosure under Texas Public Information Act requests, nor does the statute render social security numbers confidential under other legal contexts. This reading is confirmed by the one Texas Election Law Opinion on point:

The Attorney General of the State of Texas has consistently held that social security numbers are public information and are not excepted from required public disclosure under the Open Records Act.

....

[N]either the Texas Open Records Act nor the Privacy Act of 1974 prohibit the disclosure of voter registration applications which contain a person's social security number for inspection by the public.

Elec. Law Op. JWF-24 at 1-2 (Jan. 16, 1984).² A more recent Open Records Letter Ruling by the State Attorney General concerning a request by the Harris County Tax Assessor-Collector, though not binding precedent, confirmed that “although *the voter registrar* is prohibited from transcribing, copying, or recording any telephone numbers [or social security numbers] furnished on a voter registration application, persons inspecting the files were not subject to this prohibition”. Open Records Letter Ruling 1998-1468 (emphasis added).³ Although this Letter Ruling suggested that perhaps, despite this permissive treatment of social security numbers under Texas open records law, release might be barred under federal law pursuant to Social Security Act provision 42 U.S.C.A. § 405(c)(2)(C)(iv) which states: “Social security account numbers . . . maintained *by authorized persons* . . . shall be confidential, and *no authorized person* shall disclose any such . . . number or related record.” (emphasis added). However, the Attorney General’s reading of the scope of this federal provision is apparently incorrect. Another provision of this statute defines “authorized person” to mean “an officer or employee of an insurer” administering social security benefits under the Act.

Thus, despite Defendant’s contention that Plaintiffs’ access to voter registration records would impermissibly allow access to protected, confidential information is simply not supported by authority.

² Available at URL: <http://www.sos.state.tx.us/elections/elo/jwf24.pdf>

³ Available at URL: <http://www.oag.state.tx.us/opinions/openrecords/48morales/orl/1998/pdf/or199801468.pdf>

Nevertheless, the protective order afforded by Plaintiffs thoroughly secure any sensitive information.

Dated this 11th day of June, 2009.

Respectfully submitted,

TEXAS DEMOCRATIC PARTY and
BOYD L. RICHIE, in his capacity as
Chairman of the Texas Democratic Party

By: /s/ Chad W. Dunn

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on June 11, 2009 I electronically filed the foregoing document with the Clerk of the United States District Court, Southern District of Texas, Houston Division, using the electronic case filing system of the Court. The electronic case filing system sent a "Notice of Electronic Filing" to the following attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means:

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**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

TEXAS DEMOCRATIC PARTY, ET AL.	§	
	§	
V.	§	C.A. NO. 4:08-CV-3332
	§	
LEO VASQUEZ, In His Capacity as	§	
Harris County Tax Assessor Collector	§	
and Harris County Voter Registrar	§	

DIRECT QUESTIONS TO BE PROPOUNDED TO CUSTODIAN OF RECORDS FOR:

TEXAS SECRETARY OF STATE (Any & All)

1. Please state your full name, address, telephone number, occupation and official title.

ANSWER: Ann McGeehan, Director of Elections, Attorney, P. O. Box 12060, Austin, Texas 78711, (512) 463-9871.

2. I am the custodian for the Texas Secretary of State.

3. Have you been served with a subpoena duces tecum for the production of those documents listed in question number four?

ANSWER: Yes.

4. Are you among those who have possession, custody, control of, or access to ANY AND ALL RECORDS AS DESCRIBED ON THE ATTACHED EXHIBIT 'B'?

ANSWER: Yes.

5. Were the aforementioned records made in the regular course of business of your employer?

ANSWER: Yes.

6. Was it in the regular course of business of the above listed for a person with knowledge of the act, event, condition, opinion, or diagnosis recorded to make the record or to transmit information thereof to be included in such record?

ANSWER: Yes.

7. State whether these records were made at the time or shortly after the time of the transactions recorded?

ANSWER: Yes, unless otherwise indicated by the document.

8. Were these records kept as described in the preceding questions?

ANSWER: Yes, subject to 7.

9. Does the source of the information, and the method and circumstance of its preparation, establish the trustworthiness of the records?

ANSWER: Yes.

10. Please release exact duplicates of the records as requested in the subpoena duces tecum or the originals thereof for photocopying for attachment to this deposition. Have you done as requested? If not, why not?

ANSWER: Exact duplicates have been provided except for redactions of personally identifiable information, copies of statutes attached to pre-clearance submission letters, and subject to the following objections: the Secretary objects that each category of documents numbered 1-4 is overly broad.

11. Are there any records, documents, papers, correspondence or tangible matters of any kind pertaining to ALL RECORDS AS DESCRIBED ON THE ATTACHED EXHIBIT 'B' that you have not provided to the notary public taking your deposition?

ANSWER: See answer to number 10.

12. Please describe all papers, documents, records, correspondence, or tangible matters of any kind that you have not provided to the notary public taking your deposition and explain why you have not provided them.

ANSWER: See Answer to No. 10. Emails have not been provided because the search terms were so overly broad as to produce too many documents for a reasonable review of the responsiveness of those documents.

13. Are you aware that it may be necessary to subpoena you or your employer to court at the time of the trial of this case, if you have not provided to the notary public taking your deposition all papers, documents, records, correspondence, or tangible matters of any kind pertaining to ALL RECORDS AS DESCRIBED ON THE ATTACHED EXHIBIT 'B'?

ANSWER: Yes.

14. Is the attached Exhibit "A" a true and correct copy of a memorandum authored by Ann McGeehan, Director of Elections dated December 12, 2005?

ANSWER: Yes.

15. What counties or jurisdictions in Texas received the attached Exhibit "A," how was it delivered, and when?

ANSWER: Exhibit A was sent by mail to all 254 counties in Texas shortly after December 12, 2005.

16. With regard to the paragraph contained within Exhibit "A" that begins with the phrase "If an applicant provides his social security number..." (hereinafter referred to as "referenced paragraph") does this paragraph currently describe the policy of the Texas Secretary of State?

ANSWER: The paragraph does not describe a policy of the Texas Secretary of State. The paragraph describes the law.

17. With regard to the statements made in the referenced paragraph, are local voter registrars required to comply with its terms or are they free to interpret the applicable law and adopt their own policies?

ANSWER: The Secretary of State objects to vagueness regarding "statements. Subject to the foregoing, the statement within the paragraph that contains a directive is the last sentence of the paragraph. That sentence is a correct statement of the law (see Section 13.002 of the Election Code), and local voter registrars are required to comply with the law.

18. With regard to the referenced paragraph, are the statements therein mandatory directives from the Texas Secretary of State to which local registrars must comply?

ANSWER: See Answer to number 17.

19. Has your office collected any data concerning voter registration applications impacted by the statements made in the referenced paragraph throughout the State? If so, is this data separated by County? How is this data maintained? By whom? Produce any such data.

ANSWER: No.

20. With regard to the matters described in the attached Exhibit "A" Memorandum, when was it pre-cleared by the United States Attorney General or by the United States District Court for the District of Columbia?

ANSWER: October 21, 2005.

21. If you claim the matters in the attached Exhibit "A" were pre-cleared as part of the preclearance of the Texas Election Code, please state when such pre-clearance occurred.

ANSWER: Not applicable.

- a. Which sections of the Texas Election Code do you believe substantiate the statements made in Exhibit "A"?

ANSWER: Object to vagueness. Subject to the foregoing, §13.002.

- b. If you believe the matters addressed in Exhibit "A" do not require pre-clearance, please state why.

ANSWER: Not applicable.

22. Produce true and correct copies of any and all pre-clearance documents related to voter registration procedures from January 1, 2000 until the present. Have you provided these documents? If not, why not?

ANSWER: The Secretary of State objects to this question as being overly broad. Subject to this objection, all documents have been provided.

23. Produce true and correct copies of any and all correspondence, e-mails, notes, memoranda, or other documents exchanged with the Harris County Tax Assessor and Voter Registrar and/or his staff regarding voter registration procedures from January 1, 2000 to the present. Have you provided these documents? If not, why not?

ANSWER: The Secretary of State objects to this question as being overly broad. Subject to this objection, all documents have been provided.

24. Produce true and correct copies of any memoranda, letters or emails exchanged between your office and voter registration personnel around the state as they relate to handling voter registration applications from January 1, 2000 to present. Have you provided these documents? If not, why not?

ANSWER: The Secretary of State objects to this question as being overly broad. Subject to this objection, all documents have been provided.

25. Is it true that prior to January 1, 2006 the Texas Voter Registration Application did not require a voter to check a box indicating whether the voter possessed a Texas Driver's License or State identification?

ANSWER: No.

26. Is it true that a voter registration application, that is otherwise complete, and contains the last four digits of the applicant's Social Security number, no driver's license number and the box

is not checked stating no state identification number or driver's license number exists contains enough information to determine the eligibility of the voter?

ANSWER: The Secretary of State objects to this question as being misleading. There may be enough information to check eligibility on a practical basis, but the application described violate the Help America Vote Act and Section 13.002 of the Election Code. One may be able to determine whether or not the voter is eligible, but the voter could not be registered because the application is defective.

- a. Same scenario as above, but it is subsequently learned that the Applicant does have a state identification number or driver's license number. Does the application contain enough information to determine the voter is eligible to vote under the laws of the State of Texas? If not, why not?

ANSWER: See Answer to number 26.

27. For the following Counties, please provide the total number of applications received and the total number of applications rejected from January 1, 2007 until November 30, 2008. Rejected means an application was not granted within the time frame required by state and federal law, or the application was responded to by the receiving authority with a letter requesting additional information or notifying the voter of an incomplete application.

• Dallas County	<u>Received</u>	<u>Rejected</u>
ANSWER:	451, 238	1,183
• Tarrant County		
ANSWER:	173,622	10,471
• Bexar County		
ANSWER:	273, 998	7,001
• Travis County		
ANSWER:	not reported	not reported
• Nueces County		
ANSWER:	94,553	not reported
• El Paso County		
ANSWER:	97,555	4,082
• Jefferson County		
ANSWER:	14,800	14


28. Produce true and correct copies of any and all correspondence, memoranda, e-mail, or notes between your office and any Harris County official, including the Harris County

Attorneys' Office and/or the Harris County Tax Assessor Collector and Voter Registrar concerning voter registration procedures, Freedom of Information Act requests, pending lawsuits, Voting Rights Act §5 Pre-Clearance, or any other voter registration matter from January 1, 2000 to the present. Have you provided these documents? If not, why not?

ANSWER: The Secretary of State objects to the question as being overly broad. Subject to this objection, the documents have been provided.

29. Admit the voter registration rolls for each county are used by County District Clerks to summon jurors.

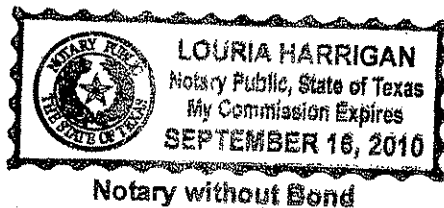
ANSWER: The Secretary of State objects to this question as being misleading. Jurors are summoned by voter registration and drivers license rolls. See Texas Government Code Section 62.001.


WITNESS (Custodian of Records)

Before me, the undersigned authority, on this day personally appeared Ann McGehee, custodian of records for the above listed, known to me to be the person whose name is subscribed to the foregoing instrument in the capacity therein stated, who being first duly sworn, stated upon his/her oath that the answers to the foregoing questions are true and correct. I further certify that the records attached hereto are exact duplicates of the original records.

SWORN TO AND SUBSCRIBED before me this 16th day of April, 2009.


NOTARY PUBLIC



UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

TEXAS DEMOCRATIC PARTY;)
BOYD L. RICHIE, in his capacity as)
Chairman of the Texas Democratic)
Party; HARRIS COUNTY DEMOCRATIC)
PARTY;)
GERALD BIRNBERG, in his capacity as)
Chairman of the Harris County)
Democratic Party; J. GOODWILLE)
PIERRE; ALEXANDRA GIBBS;)
JEFFREY T. VANSCHOONHOVEN;)
BONI SUE LESZCZUK; and ERIC J.)
GALLOWAY)

Plaintiffs,)

VS.)

Cause No. 4:08-CV-03332

LEO VASQUEZ, in his capacity as)
Harris County Tax Assessor Collector))
and Harris County Voter Registrar)

Defendant.)

ORAL DEPOSITION OF
MICHELLE DIXON
MARCH 11, 2009

ORAL DEPOSITION OF MICHELLE DIXON, produced as a witness at the instance of the PLAINTIFFS, was taken in the above-styled and numbered cause on March 11, 2009, from 10:25 a.m. to 12:24 p.m., before Lori Childers, Certified Shorthand Reporter in and for the State of Texas, reported by computerized stenotype machine at the offices of Clinton Gambill, 1019 Congress, 15th Floor, Houston, Texas 77002, pursuant to the Federal Rules of Civil Procedure.

1 Q Okay. All right.

2 A No.

3 Q So it's just the affidavit itself?

4 A That's correct.

5 Q And when the -- when the affidavits are brought in,
6 are they brought in in an -- individually in an envelope? Or
7 how are they brought in?

8 A That's when the provisional -- now, the provisional
9 ballots themselves, I'm not sure because that's taken to the
10 county clerk. But the affidavits -- the affidavits are in a
11 sealed -- they have to be in a sealed envelope.

12 Q Okay. Who's the person responsible for opening the
13 sealed envelope?

14 A The managers.

15 Q And that would be Ed Johnson?

16 A Ed Johnson, Chris German.

17 Q George Hammerlein?

18 A George -- I haven't seen him open too many.

19 Q Okay. All right. He's got people to direct --

20 A Right.

21 Q -- to do that.

22 All right. Fair enough.

23 A He's the director.

24 Q Okay. So imaging takes it over?

25 A Uh-huh.

1 A That's like the main reasons, is if they moved out of
2 the county, they're living in another county, they've died,
3 and they've been on suspense that time and they didn't update.

4 Q So those are the three reasons you can think of
5 that --

6 A That I can think of.

7 Q Okay.

8 A Uh-huh.

9 Q And do you know who was in charge of purging voters
10 from the system?

11 A It would -- I know Ed Johnson but -- probably
12 Ed Johnson and Mr. Hammerlein. But I can't tell you which one
13 would actually go in and -- and go ahead and do it. I'm not
14 sure.

15 Q Okay. But Ed Johnson, as far as you know, is in
16 charge of those systems?

17 A Yes.

18 Q Okay. Now, did anybody ever send you an E-mail or a
19 memo or come and tell you, "Hey, don't throw away any
20 documents that you have from the 2008 election. Don't throw
21 away" -- "don't delete any E-mails that you have that concern
22 the 2000 (sic) election"? Did anybody --

23 A No.

24 Q -- come to you and tell you that?

25 A No.

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

TEXAS DEMOCRATIC PARTY;)
BOYD L. RICHIE, in his capacity as)
Chairman of the Texas Democratic)
Party; HARRIS COUNTY DEMOCRATIC)
PARTY;)
GERALD BIRNBERG, in his capacity as)
Chairman of the Harris County)
Democratic Party; J. GOODWILLE)
PIERRE; ALEXANDRA GIBBS;)
JEFFREY T. VANSCHOONHOVEN;)
BONI SUE LESZCZUK; and ERIC J.)
GALLOWAY)

Plaintiffs,)

VS.)

Cause No. 4:08-CV-03332

LEO VASQUEZ, in his capacity as)
Harris County Tax Assessor Collector))
and Harris County Voter Registrar)

Defendant.)

ORAL DEPOSITION OF
ELIZABETH HERNANDEZ
MARCH 10, 2009

ORAL DEPOSITION OF ELIZABETH HERNANDEZ, produced as a witness at the instance of the PLAINTIFFS, was taken in the above-styled and numbered cause on March 10, 2009, from 9:57 a.m. to 12:50 p.m., before Lori Childers, Certified Shorthand Reporter in and for the State of Texas, reported by computerized stenotype machine at the offices of Clinton Gambill, 1019 Congress, 15th Floor, Houston, Texas 77002, pursuant to the Federal Rules of Civil Procedure.

1 Q You weren't involved in the request?

2 A No.

3 Q Would it have been Frances, if anyone was involved in
4 that?

5 A Probably Mr. Johnson, Ed Johnson.

6 Q Is it fair to say that Mr. Johnson is actively
7 involved in managing your department?

8 A Yes.

9 Q Other than Mr. Johnson and Frances, who were the
10 other fairly active managers of the department?

11 A Mr. Johnson's pretty much the one that does
12 everything. Hammerlein doesn't really do too much. Chris
13 German's kind of active in doing things, as well.

14 Q Any others?

15 A No, that's about it.

16 Q When Mr. Bettencourt was in office, how would you
17 describe his involvement or supervision of the registration
18 office?

19 A I hardly ever seen him go in our office.

20 Q Did you receive any communications, memos, E-mails,
21 et cetera from him?

22 A Regarding?

23 Q Voter registration.

24 A Yeah, we would get memos every once in a while.

25 Q And some of these memos would come from

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

TEXAS DEMOCRATIC PARTY;)
BOYD L. RICHIE, in his capacity as)
Chairman of the Texas Democratic)
Party; HARRIS COUNTY DEMOCRATIC)
PARTY;)
GERALD BIRNBERG, in his capacity as)
Chairman of the Harris County)
Democratic Party; J. GOODWILLE)
PIERRE; ALEXANDRA GIBBS;)
JEFFREY T. VANSCHOONHOVEN;)
BONI SUE LESZCZUK; and ERIC J.)
GALLOWAY)

Plaintiffs,)

VS.)

Cause No. 4:08-CV-03332

LEO VASQUEZ, in his capacity as)
Harris County Tax Assessor Collector)
and Harris County Voter Registrar)

Defendant.)

ORAL DEPOSITION OF
KIMBERLY SHOEMAKER
MARCH 10, 2009

ORAL DEPOSITION OF KIMBERLY SHOEMAKER, produced as a witness at the instance of the PLAINTIFFS, was taken in the above-styled and numbered cause on March 10, 2009, from 3:05 p.m. to 3:34 p.m., before Lori Childers, Certified Shorthand Reporter in and for the State of Texas, reported by computerized stenotype machine at the offices of Clinton Gambill, 1019 Congress, 15th Floor, Houston, Texas 77002, pursuant to the Federal Rules of Civil Procedure.

1 A Yes.

2 Q Okay. Tell me about that training.

3 A Our -- our manager told us how to handle it.

4 Q Okay. And who's the manager, again?

5 A Ed Johnson.

6 Q Ed Johnson. What did Ed Johnson tell you about
7 provisional ballots?

8 A To put the -- where to put the sticker on it.

9 Q Okay.

10 A Or who it needs to go to next and to the processors.

11 Q Okay. Is there any kind of, what the police could
12 call, chain of custody? Like, when the provisional ballots
13 come in, does somebody have to sign for them, that you're
14 aware of?

15 A No.

16 Q Okay. Is there anybody standing around watching you
17 guys to see what you're doing with the provisional ballots, or
18 is it pretty much just a free for all?

19 A Sometimes our manager will stand over us.

20 Q Okay.

21 A Ed Johnson will stand over us.

22 Q Sometimes he will, and sometimes he won't?

23 A Yes.

24 Q Okay. Thank you.

25 MR. PRATHER: Can I see Exhibit 1 one real

FILED
In the Office of the
Secretary of State of Texas

SEP 03 2003

Corporations Section

ARTICLES OF ORGANIZATION
OF
CAMPAIGN DATA SYSTEMS

I, the undersigned natural person, having attained at least the minimum age set forth in Article 3.01 of the Texas Limited Liability Company Act (the "LLCA") and acting as an organizer thereunder of a limited liability company (hereinafter referred to as the "Company"), do hereby adopt the following Articles of Organization of the Company:

ARTICLE I
NAME

The name of the Company shall be "CAMPAIGN DATA SYSTEMS", LLC "

ARTICLE II
POWERS

The Company shall have all the powers accorded to a limited liability company under the LLCA.

ARTICLE III
PURPOSES

The purpose for which the Company is organized is to transact any or all lawful business for which limited liability companies may be organized under the LLCA.

ARTICLE IV
DURATION

The Company's period of duration be perpetual.

ARTICLE V
REGULATIONS

The initial members of the Company shall adopt the Regulations that shall govern the Regulation and management of the affairs of the Company, provided, however, that the failure to adopt such Regulations prior to the date on which the Secretary of the State of Texas issues a Certificate of Organization shall not affect the Company's commencement of existence on such date. The Regulations shall provide for all the terms and conditions for the Regulation and management of the affairs of the Company not inconsistent with applicable law or with these Articles of Organization. The power to adopt, alter, amend or repeal the Regulations shall be vested in the members of the Company unless vested in whole or part in the managers of the Company by the Regulations.

Unless otherwise provided in these Articles of Organization or regulations, adoption, alteration, amendment, or repeal of the regulations shall require the affirmative vote, approval, or consent of all the members.

ARTICLE VI MANAGERS

The management of the Company is vested in the managers of the Company, except to the extent that the Regulations shall reserve the same, in whole or in part, to the members of the Company. Unless otherwise required by the Regulations, the managers of the Company need not be members of the Company and need not be residents of the State of Texas. Managers shall be elected by the members at the annual meeting of the members. The Regulations may provide that the holders of a particular class of membership interests may be entitled to elect the managers.

The number of initial managers of the Company shall be two (2), and the name and address of each of the initial managers, who shall serve as managers of the Company until the first annual meeting of the members of the Company or until their successors are duly elected and qualified, are set forth below:

<u>Name</u>	<u>Address</u>
Edward Johnson, Jr.	214 Stoney Creek Houston, Texas 77024
Dwayne Bohac	4415 Lorinda Drive Houston, Texas 77018

ARTICLE VII PRINCIPAL PLACE OF BUSINESS

The principal place of business of the Company is 214 Stoney Creek, Houston, Texas 77024.

ARTICLE VII NAME AND ADDRESS OF INITIAL REGISTERED AGENT

The initial registered agent of the Company is Dwayne Bohac. The address of the initial registered office is 5109 Lido Lane, Houston, Texas 77092.

ARTICLE VIII MEMBERSHIP INTERESTS

The membership interests in the Company shall be defined and established in the Regulations, including the relative rights, powers, and duties, including voting rights, thereof.

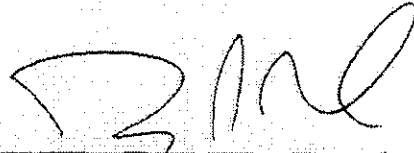
ARTICLE IX
INDEMNIFICATION

The Company shall indemnify any person who was or is a party or is threatened to be made a party to any threatened, pending or completed action, suit or proceeding, whether civil, criminal, administrative, arbitratve or investigative, any appeal in such an action, suit or proceeding and any inquiry or investigation that could lead to such an action, suit or proceeding (whether or not by or in the right of the Company), by reason of the fact that he or she is or was a member, manager, officer, employee or agent of the Company or is or was serving at the request of the Company as a manager, director, officer, partner, venturer, proprietor, trustee, employee, agent or similar functionary of another limited liability company, corporation, employee benefit plan, other enterprise, or other entity against all judgments, penalties (including excise and similar taxes), fines, settlements and reasonable expenses (including attorneys' fees and court costs) actually and reasonably incurred by him or her in connection with such action, suit or proceeding to the fullest extent permitted by any applicable law, and such indemnity shall inure to the benefit of the heirs, executors and administrators of any such person so indemnified pursuant to this Article X. The right to indemnification under this Article X shall be a contract right and shall not be deemed exclusive of any other right to which those seeking indemnification may be entitled under the Regulations or any law, agreement, vote of members or disinterested managers or otherwise, both as to action in his or her official capacity and as to action in another capacity while holding such office.

NAME AND ADDRESS OF
ORGANIZER

DWAYNE BOHAC
4415 LORINDA DR.
HOUSTON, TX 77018

IN WITNESS WHEREOF, I have executed these Articles of Organization this 3rd day of September, 2003.



Printed Name: DWAYNE BOHAC

05-102
(11-06/20)

3333

a T Code ■ 13196

This report MUST be filed to satisfy franchise tax requirements

TEXAS FRANCHISE TAX PUBLIC INFORMATION REPORT

c Taxpayer identification number 15224093532	d Report year 2007
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Corporation name and address

CAMPAIGN DATA SYSTEMS, LLC KBRI455 9364
9218 RANGLEY
HOUSTON, TX 77055
2H30 08/20/07

e PIR / IND 1 4

Secretary of State file number or, if none, Comptroller unchartered number

Item k on Franchise Tax Report, Form 05-142 9 ■ 0800244147



Please mark through any incorrect information, and type or print the correct information. The following information is required by Section 171.203 of the Tax Code for each corporation or limited liability company that files a Texas Corporation Franchise Tax Report. Use additional sheets for Sections A, B, and C, if necessary. The information will be available for public inspection.

Check here if there are currently no changes to the information preprinted in Section A of this report. Then, complete Sections Band C.

1522409353207

Please sign below! Officer and director information is reported as of the date a Public Information Report is completed. The information is updated annually as part of the franchise tax report. There is no requirement or procedure for supplementing the information as officers and directors change throughout the year.

Corporation's principal office
9218 RANGLEY, HOUSTON, TX 77055

Principal place of business
9218 RANGLEY, HOUSTON, TX 77055

SECTION A. Name, title, and mailing address of each officer and director.

NAME	TITLE	DIRECTOR	Term expiration (mm-dd-yyyy)
ED JOHNSON, JR.	MEM	<input checked="" type="checkbox"/> Yes	12/31/2007
MAILING ADDRESS 214 STONEY CREEK HOUSTON TX 77024			
DWAYNE BOHAC	MEM	<input checked="" type="checkbox"/> Yes	12/31/2007
MAILING ADDRESS 9218 RANGLEY HOUSTON TX 77055			
		<input type="checkbox"/> Yes	
MAILING ADDRESS			
		<input type="checkbox"/> Yes	
MAILING ADDRESS			
		<input type="checkbox"/> Yes	
MAILING ADDRESS			

SECTION B. List each corporation or limited liability company, if any, in which this reporting corporation or limited liability company owns an interest of ten percent (10%) or more. Enter the information requested for each corporation or limited liability company.

Name of owned (subsidiary) corporation or limited liability company	State of incorporation	Texas SOS file number	Percentage interest
NONE			
Name of owned (subsidiary) corporation or limited liability company	State of incorporation	Texas SOS file number	Percentage interest

SECTION C. List each corporation or limited liability company, if any, that owns an interest of ten percent (10%) or more in this reporting corporation or limited liability company. Enter the information requested for each corporation or limited liability company.

Name of owning (parent) corporation or limited liability company	State of incorporation	Texas SOS file number	Percentage interest
NONE			

Registered agent and registered office currently on file. (See instructions if you need to make changes.)

Agent: DWAYNE BOHAC
Office: 9218 RANGLEY HOUSTON TX 77055

Check here if you need forms to change the registered agent or registered office information.

I declare that the information in this document and any attachments is true and correct to the best of my knowledge and belief, as of the date below, and that a copy of this report has been mailed to each person named in this report who is an officer or director and who is not currently employed by this, or a related, corporation or limited liability company. TXCA0501L 01/12/07

sign here Officer, director, or other authorized person Title: MANAGER Date: 7/31/07 Daytime phone: (Area code and number)

07239240613

U.T. Code 13196

3333

Filing Number: 800244147
05167150101

**TEXAS FRANCHISE TAX
PUBLIC INFORMATION REPORT**
MUST be filed to satisfy franchise tax requirements

Do not write in the space above

c. Taxpayer identification number 522409353 2	d. Report year 2005
--	------------------------

Corporation name and address

CAMPAIGN DATA SYSTEMS LLC
9218 RANGLEY
HOUSTON, TX 77055

e. PIR / IND 1, 2, 3, 4

Secretary of State file number or, if none, Comptroller unchartered number

Item 1 on Franchise Tax Report, Form 05-142 32012277714

If the preprinted information is not correct, please type or print the correct information.

The following information MUST be provided for the Secretary of State (S.O.S.) by each corporation or limited liability company that files a Texas Corporation Franchise Tax Report. Use additional sheets for Sections A, B, and C, if necessary. The information will be available for public inspection.

Please sign below! Officer and director information is reported as of the date a Public Information Report is completed. The information is updated annually as part of the franchise tax report. There is no requirement or procedure for supplementing the information as officers and directors change throughout the year.

Blacken this circle completely if there are currently no changes to the information preprinted in Section A of this report. Then, complete Sections B and C.

Corporation's principal office
HOUSTON, TX

Principal place of business
HOUSTON, TX

SECTION A. Name, title and mailing address of each officer and director.

NAME	TITLE	DIRECTOR	Term expiration (mm-dd-yyyy)
DWAYNE BOHAC	DIRECTOR	<input checked="" type="checkbox"/> YES	
MAILING ADDRESS: 9218 RANGLEY, HOUSTON, TX 77055			
ED JOHNSON, JR.	DIRECTOR	<input checked="" type="checkbox"/> YES	
MAILING ADDRESS: 214 STONEY CREEK, HOUSTON, TX 77024			
		<input type="checkbox"/> YES	
		<input type="checkbox"/> YES	
		<input type="checkbox"/> YES	

SECTION B. List each corporation or limited liability company, if any, in which this reporting corporation or limited liability company owns an interest of ten percent (10%) or more. Enter the information requested for each corporation or limited liability company.

Name of owned (subsidiary) corporation	State of Incorporation	Texas SOS file number	Percentage Interest
None			

SECTION C. List each corporation or limited liability company, if any, that owns an interest of ten percent (10%) or more in this reporting corporation or limited liability company. Enter the information requested for each corporation or limited liability company.

Name of owning (parent) corporation	State of Incorporation	Texas SOS file number	Percentage Interest
None			

Registered agent and registered office currently on file. (See instructions if you need to make changes.)
Agent: DWAYNE BOHAC, DIRECTOR
Office: 9218 RANGLEY
HOUSTON, TX 77055

Blacken this circle if you need forms to change this information. Changes can also be made online at <http://www.sos.state.tx.us/corp/sosda/index.shtml>

I declare that the information in this document and any attachments is true and correct to the best of my knowledge and belief, as of the date below, and that a copy of this report has been mailed to each person named in this report who is an officer or director and who is not currently employed by this corporation or limited liability company or a related corporation.

sign here  Title: DIRECTOR Date: 7/24/05 Daytime phone (Area code and number): 713.240.5275

480001
11-02-04

CCH

a T Code ■ 13196

TEXAS FRANCHISE TAX PUBLIC INFORMATION REPORT

MUST be filed to satisfy franchise tax requirements

Do not write in the space above

c Taxpayer identification number ■ 15224093532	d Report year ■ 2006
---	-------------------------

Corporation name and address

CAMPAIGN DATA SYSTEMS LLC
9218 RANGLEY
HOUSTON, TX 77055

e PIR / IND	1	4
Secretary of State file number or, if none, Comptroller unchartered number		
g ■		
Item k on Franchise Tax Report, Form 05-142 0800244147		

If the preprinted information is not correct, please type or print the correct information. The following information MUST be provided for the Secretary of State (SOS) by each corporation or limited liability company that files a Texas Corporation Franchise Tax Report. Use additional sheets for Sections A, B, and C, if necessary. The information will be available for public inspection.

Check here if there are currently no changes to the information preprinted in Section A of this report. Then, complete Sections Band C.



1522409353206

Please sign below! Officer and director information is reported as of the date a Public Information Report is completed. The information is updated annually as part of the franchise tax report. There is no requirement or procedure for supplementing the information as officers and directors change throughout the year.

Corporation's principal office

9218 RANGLEY, HOUSTON, TX 77055

Principal place of business

9218 RANGLEY, HOUSTON, TX 77055

SECTION A. Name, title, and mailing address of each officer and director.

NAME	TITLE	DIRECTOR	Term expiration (mm-dd-yyyy)
ED JOHNSON, JR.	MEM	<input checked="" type="checkbox"/> Yes	12/31/2007
MAILING ADDRESS 214 STONEY CREEK HOUSTON TX 77024			
DWAYNE BOHAC	MEM	<input checked="" type="checkbox"/> Yes	12/31/2007
MAILING ADDRESS 9218 RANGLEY HOUSTON TX 77055			
		<input type="checkbox"/> Yes	
MAILING ADDRESS			
		<input type="checkbox"/> Yes	
MAILING ADDRESS			
		<input type="checkbox"/> Yes	
MAILING ADDRESS			

SECTION B. List each corporation or limited liability company, if any, in which this reporting corporation or limited liability company owns an interest of ten percent (10%) or more. Enter the information requested for each corporation or limited liability company.

Name of owned (subsidiary) corporation	State of incorporation	Texas SOS file number	Percentage interest
NONE			
Name of owned (subsidiary) corporation	State of incorporation	Texas SOS file number	Percentage interest

SECTION C. List each corporation or limited liability company, if any, that owns an interest of ten percent (10%) or more in this reporting corporation or limited liability company. Enter the information requested for each corporation or limited liability company.

Name of owning (parent) corporation	State of incorporation	Texas SOS file number	Percentage interest
NONE			

Registered agent and registered office currently on file. (See instructions if you need to make changes.)

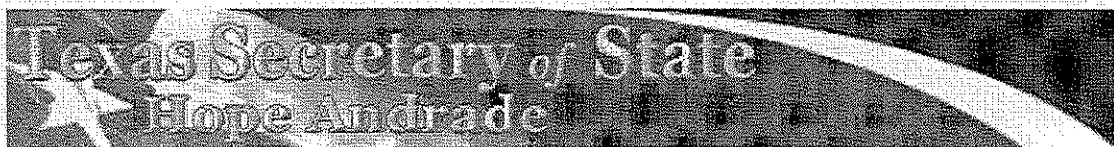
Agent: DWAYNE BOHAC
Office: 9218 RANGLEY
HOUSTON TX 77055

Check here if you need forms to change this information. Changes can also be made on-line at <http://www.sos.state.tx.us/corp/sosdis/index.shtml>

I declare that the information in this document and any attachments is true and correct to the best of my knowledge and belief, as of the date below, and that a copy of this report has been mailed to each person named in this report who is an officer or director and who is not currently employed by this corporation or limited liability company or a related corporation.

sign here Officer, director, or other authorized person

Signature: [Handwritten Signature] Title: PARTNER Date: 5/17/06 Daytime phone (Area code and number): 713.240.5275



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BUSINESS ORGANIZATIONS INQUIRY - VIEW ENTITY

Filing Number: 800244147 **Entity Type:** Domestic Limited Liability Company (LLC)

Original Date of Filing: September 3, 2003 **Entity Status:** In existence

Formation Date: N/A

Tax ID: 15224093532 **FEIN:**

Duration: Perpetual

Name: CAMPAIGN DATA SYSTEMS, LLC

Address: 9218 RANGLEY
HOUSTON, TX 77055 USA

<u>REGISTERED</u> <u>AGENT</u>	<u>FILING</u> <u>HISTORY</u>	<u>NAMES</u>	<u>MANAGEMENT</u>	<u>ASSUMED</u> <u>NAMES</u>	<u>ASSOCIATED</u> <u>ENTITIES</u>
Last Update	Name	Title	Address		
December 17, 2007	DWAYNE BOHAC	Director	9218 RANGLEY HOUSTON, TX 77055 USA		
December 17, 2007	DWAYNE BOHAC	Member	9218 RANGLEY HOUSTON, TX 77055 USA		
December 17, 2007	ED JOHNSON Jr	Director	214 STONEY CREEK HOUSTON, TX 77024 USA		
December 17, 2007	ED JOHNSON Jr	Member	214 STONEY CREEK HOUSTON, TX 77024 USA		

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Expenditures disclosed in special pre-election reports (formerly telegram reports) appear highlighted. These expenditures are also required to be disclosed in the subsequent report, which may explain why an expenditure appears twice in the query results.

Records marked with an 'X' in the Reimbursement Intended field indicate the filer intends to be reimbursed for expenditures made from personal funds.

Report #	Filer ID	Report Type	Filer's Name	Payee's Name	Amount	Date	Description
346460	00060364	Spac---	Texans For John Davis,	Campaign Data Systems,	\$ 1,330.96	6/18/07	Voter List
365660	00062566	Jcoo---	Farr, David D.	Campaign Data Systems,	\$ 403.24	2/07/08	Mailing Lists
365836	00060364	Spac---	Texans For John Davis,	Campaign Data Systems,	\$ 1,350.96	2/07/08	Voter Lists
365836	00060364	Spac---	Texans For John Davis,	Campaign Data Systems,	\$ 202.97	2/19/08	Voter Lists
365839	00038214	Gpac---	Conservative Republicans Of Texas,	Campaign Data Systems,	\$ 228.28	2/12/08	Voter Lists
365839	00038214	Gpac---	Conservative Republicans Of Texas,	Campaign Data Systems,	\$ 135.78	2/12/08	Voter Lists
365839	00038214	Gpac---	Conservative Republicans Of Texas,	Campaign Data Systems,	\$ 61.54	2/12/08	Voter Lists
365839	00038214	Gpac---	Conservative Republicans Of Texas,	Campaign Data Systems,	\$ 17.57	2/12/08	Voter Lists
365951	00061811	Coh---	Legler, Ken J.	Campaign Data Systems,	\$ 202.97	2/19/08	Voter Lists
365951	00061811	Coh---	Legler, Ken J.	Campaign Data Systems,	\$ 3,249.67	2/19/08	Voter Lists
365983	00062321	Coh---	Sheffield, Ralph E.	Campaign Data Systems,	\$ 202.97	2/14/08	Data Consulting
368467	00062321	Coh---	Sheffield, Ralph E.	Campaign Data Systems,	\$ 202.97	3/05/08	Data Services
368458	00061811	Coh---	Legler, Ken J.	Campaign Data Systems,	\$ 487.13	3/27/08	Voter Lists
363168	00062321	Coh---	Sheffield, Ralph E.	Campaign Data Systems,	\$ 2,165.00	1/16/08	Data Service Fee
361733	00060364	Spac---	Texans For John Davis,	Campaign Data Systems,	\$ 405.94	12/14/07	Voter Lists
361528	00016024	Spac---	Friends Of Kyle Janek,	Campaign Data Systems,	\$ 405.94	12/14/07	Voter Lists
346460	00060364	Spac---	Texans For John Davis,	Campaign Data Systems,	\$ 500.00	2/05/07	Voter List
347353	00060132	Coh---	Weber, Randy K.	Campaign Data Systems,	\$ 2,706.25	2/05/07	Computer Program
347210	00060452	Spac---	Friends Of John Zerwas,	Campaign Data Systems,	\$ 500.00	2/05/07	Voter Lists
347210	00060452	Spac---	Friends Of John Zerwas,	Campaign Data Systems,	\$ 1,350.96	6/18/07	Voter Lists
347201	00016024	Spac---	Friends Of Kyle Janek,	Campaign Data Systems,	\$ 2,396.54	6/18/07	Voter Lists
357242	00020836	Coh---	Talton, Robert E.	Campaign Data Systems,	\$ 4,088.31	7/08/07	Data Processing And Access
360709	00020513	Coh---	Jackson, James M.	Campaign Data Systems,	\$ 902.07	12/24/07	Campaign Database Service
360709	00020513	Coh---	Jackson, James M.	Campaign Data Systems,	\$ 625.00	10/06/07	Campaign Database Service
361366	00060452	Spac---	Friends Of John Zerwas,	Campaign Data Systems,	\$ 405.94	12/14/07	Research
361405	00060451	Spac---	Friends Of Jim Murphy,	Campaign Data Systems,	\$ 405.94	12/14/07	Voter Lists
361481	00057897	Coh---	Patrick, Dan	Campaign Data Systems,	\$ 1,894.40	9/11/07	Data Costs
361481	00057897	Coh---	Patrick, Dan	Campaign Data Systems,	\$ 1,894.40	11/30/07	Data Costs
368458	00061811	Coh---	Legler, Ken J.	Campaign Data Systems,	\$ 202.97	2/26/08	Voter Lists
376200	00062804	Jcoo---	Kerrigan, Patricia J.	Campaign Data Systems,	\$ 595.38	3/06/08	Voter Lists
400788	00028384	Gpac---	Conservative Republicans Of Harris County Pac,	Campaign Data Systems,	\$ 2,147.19	11/17/08	Voter Lists
400801	00060364	Spac---	Texans For John Davis,	Campaign Data Systems,	\$ 1,350.96	12/30/08	Voter Lists
400834	00061811	Coh---	Legler, Ken J.	Campaign Data Systems,	\$ 1,576.12	12/30/08	Voter Lists
400838	00060451	Spac---	Friends Of Jim Murphy,	Campaign Data Systems,	\$ 162.38	11/17/08	Voter Lists
400838	00060451	Spac---	Friends Of Jim Murphy,	Campaign Data Systems,	\$ 1,350.96	12/30/08	Voter Lists
400851	00060132	Coh---	Weber, Randy K.	Campaign Data Systems,	\$ 1,350.96	12/30/08	Voter Lists
400871	00060452	Spac---	Friends Of John Zerwas,	Campaign Data Systems,	\$ 3,850.96	12/30/08	Voter Lists
386975	00060451	Spac---	Friends Of Jim Murphy,	Campaign Data Systems,	\$ 1,350.96	7/28/08	Voter Lists
386979	00060132	Coh---	Weber, Randy K.	Campaign Data Systems,	\$ 225.16	7/28/08	Voter Lists
386947	00060364	Spac---	Texans For John Davis,	Campaign Data Systems,	\$ 1,350.96	7/28/08	Voter Lists
386988	00060452	Spac---	Friends Of John Zerwas,	Campaign Data Systems,	\$ 1,350.96	7/28/08	Voter Lists
387256	00020513	Coh---	Jackson, James M.	Campaign Data Systems,	\$ 1,350.96	8/08/08	Campaign Database Service
400596	00062321	Coh---	Sheffield, Ralph E.	Campaign Data Systems,	\$ 4,094.52	12/28/08	Database Services
401240	00057897	Coh---	Patrick, Dan	Campaign Data Systems,	\$ 1,894.40	10/17/08	Data Costs
389045	00051296	Coh---	Riddle, Deborah A.	Campaign Data Systems,	\$ 2,701.92	9/29/08	Data Program
376793	00060132	Coh---	Weber, Randy K.	Campaign Data Systems,	\$ 2,702.97	3/26/08	Voter Lists
376793	00060132	Coh---	Weber, Randy K.	Campaign Data Systems,	\$ 2,708.41	2/27/08	Voter Lists
377178	00060364	Spac---	Texans For John Davis,	Campaign Data Systems,	\$ 202.97	2/26/08	Voter Lists

377178	00060364	Spac---	Texans For John Davis,	Campaign Data Systems,	\$ 2,707.97	3/26/08	Voter Lists			
377231	00060452	Spac---	Friends Of John Zerwas,	Campaign Data Systems,	\$ 1,350.96	3/26/08	Voter Lists			
378275	00061811	Coh----	Legler, Ken J.	Campaign Data Systems,	\$ 2,662.38	4/21/08	Voter Lists			
378366	00020836	Coh----	Talton, Robert E.	Campaign Data Systems,	\$ 1,041.65	3/06/08	Subscription			
380511	00062321	Coh----	Sheffield, Ralph E.	Campaign Data Systems,	\$ 202.97	4/09/08	Data Service & Consulting			
386816	00062124	Coh----	Meyers, Gregory A.	Campaign Data Systems,	\$ 2,703.00	7/25/08	Consulting Services			
386837	00037927	Coh----	Harless, Patricia F.	Campaign Data Systems,	\$ 2,701.92	8/01/08	Data Lists			
387179	00062321	Coh----	Sheffield, Ralph E.	Campaign Data Systems,	\$ 450.32	7/21/08	Data Service			
407619	00060451	Spac---	Friends Of Jim Murphy,	Campaign Data Systems,	\$ 1,353.10	2/07/08	Voter Lists			
235293	00028135	Gpac---	Texans For Lawsuit Reform Pac,	Campaign Data Systems,	\$ 270.63	11/03/03	Consulting Expenses - Inkind Contribution Joe Nixon Hd			
299545	00054542	Spac---	Texans For Joe Nixon,	Campaign Data Systems,	\$ 1,704.94	9/09/05	Voter Data			
299545	00054542	Spac---	Texans For Joe Nixon,	Campaign Data Systems,	\$ 757.75	10/05/05	Voter Data			
299545	00054542	Spac---	Texans For Joe Nixon,	Campaign Data Systems,	\$ 451.03	8/11/05	Voter Data			
284555	00053858	Coh----	Witt, Ann L.	Campaign Data Systems,	\$ 676.56	3/20/05	Data Services			
298562	00040436	Coh----	Wong, Martha J.	Campaign Data Systems,	\$ 991.57	10/25/05	Software Set-up & Subscription			
298515	00057835	Coh----	Schofield, Michael	Campaign Data Systems,	\$ 1,143.12	10/13/05	Voter Tracking Consulting			
299034	00024733	Coh----	Murphy, James R.	Campaign Data Systems,	\$ 500.00	9/16/05	Direct Mail:voter Contact			
301801	00024733	Coh----	Murphy, James R.	Campaign Data Systems,	\$ 902.81	1/02/06	Voter Contact			
301403	00057835	Coh----	Schofield, Michael	Campaign Data Systems,	\$ 902.81	1/01/06	Voter Tracking Consulting			
315909	00056553	Spac---	Texans For Elizabeth Jones,	Campaign Data Systems,	\$ 3,139.25	6/16/06	Computer Services			
315752	00054542	Spac---	Texans For Joe Nixon,	Campaign Data Systems,	\$ 2,273.25	3/07/06	Researching Fees			
304135	00057835	Coh----	Schofield, Michael	Campaign Data Systems,	\$ 1,112.00	2/12/06	Voter Tracking Consulting			
296391	00058086	Spac---	Friends Of Ben Bentzin,	Campaign Data Systems,	\$ 1,596.69	1/05/06	Computer Services			
291625	00028135	Gpac---	Texans For Lawsuit Reform Pac,	Campaign Data Systems,	\$ 181.26	11/21/05	In-kind Consulting Services / Laura Salinas Campaign - H			
242396	00054542	Spac---	Texans For Joe Nixon,	Campaign Data Systems,	\$ 1,082.50	1/26/04	Licensing			
244075	00053921	Coh----	Zieben, Lee	Campaign Data Systems,	\$ 676.55	2/02/04	Campaign Computer Software			
244314	00041903	Coh----	Callegari, William A.	Campaign Data Systems,	\$ 270.63	2/19/04	Campaign Supply Expense			
254762	00054764	Jeoh---	Munoz, Emily	Campaign Data Systems,	\$ 802.91	6/17/04	Republican Phone List			
254819	00054542	Spac---	Texans For Joe Nixon,	Campaign Data Systems,	\$ 4,041.50	4/15/04	Professional Campaign Services			
254819	00054542	Spac---	Texans For Joe Nixon,	Campaign Data Systems,	\$ 1,082.50	1/26/04	Professional Campaign Services			
254819	00054542	Spac---	Texans For Joe Nixon,	Campaign Data Systems,	\$ 1,082.00	3/10/04	Professional Campaign Services			
254967	00041903	Coh----	Callegari, William A.	Campaign Data Systems,	\$ 250.00	3/22/04	Campaign Computer Services Fee			
259867	00020170	Coh----	Heflin, Talmadge L.	Campaign Data Systems,	\$ 632.18	9/27/04	Database Set-up Licensing August -september Access Re			
260308	00028135	Gpac---	Texans For Lawsuit Reform Pac,	Campaign Data Systems,	\$ 4,828.81	10/04/04	In-kind Voter File / Hd 56 - Doc Anderson (r)			
258498	00053858	Coh----	Witt, Ann L.	Campaign Data Systems,	\$ 2,516.81	9/23/04	Data Services			
304330	00040436	Coh----	Wong, Martha J.	Campaign Data Systems,	\$ 450.32	1/31/06	Data Analysis Subscription			
304472	00024733	Coh----	Murphy, James R.	Campaign Data Systems,	\$ 1,203.74	2/20/06	Voter Contact			
346408	00060451	Spac---	Friends Of Jim Murphy,	Campaign Data Systems,	\$ 1,353.10	6/18/07	Voter Lists			
321371	00040436	Coh----	Wong, Martha J.	Campaign Data Systems,	\$ 1,576.12	8/04/06	Data Analysis Software Subscription			
322431	00024470	Coh----	Woolley, Beverly	Campaign Data Systems,	\$ 1,347.41	10/18/06	Voter Lists			
322297	00058233	Coh----	Fleece, Jeffrey W.	Campaign Data Systems,	\$ 405.94	10/25/06	Data Entry/analysis			
522550	00058497	Coh----	Zerwas, John M.	Campaign Data Systems,	\$ 1,667.50	10/27/06	Computer			
322758	00028384	Gpac---	Conservative Republicans Of Harris County Pac,	Campaign Data Systems,	\$ 1,467.57	10/26/06	Voter Contact: List			
322677	00024733	Coh----	Murphy, James R.	Campaign Data Systems,	\$ 902.07	10/27/06	Internet			
322658	00020170	Coh----	Heflin, Talmadge L.	Campaign Data Systems,	\$ 541.25	10/25/06	Database Subscription			
329028	00058074	Coh----	Beckham, James R.	Campaign Data Systems,	\$ 1,363.31	8/15/06	Voter Data			
331771	00040436	Coh----	Wong, Martha J.	Campaign Data Systems,	\$ 1,162.61	10/31/06	Data Analysis Software Subscription			
334301	00056553	Spac---	Texans For Elizabeth Jones,	Campaign Data Systems,	\$ 1,299.00	11/06/06	Computer Services			
343076	00057897	Coh----	Patrick, Dan	Campaign Data Systems,	\$ 1,458.25	11/20/06	Data Costs			
320523	00020836	Coh----	Talton, Robert E.	Campaign Data Systems,	\$ 1,353.13	8/29/06	Data Processing And Access			
320535	00020836	Coh----	Talton, Robert E.	Campaign Data Systems,	\$ 1,353.13	1/09/06	Data Processing And Access			
Report #	Filer ID	Report Type	Filer's Name	Payee's Name	Amount	Date	Description	Payee's City	Payee's State	Payee's Zipcode
314288	00055758	Coh----	Ellis, Mark A.	Campaign Data Systems,	\$ 659.91	2/27/06	Sd 7 Data	Houston	Tx	77055
315791	00024733	Coh----	Murphy, James R.	Campaign Data Systems,	\$ 2,987.13	6/13/06	Voter Contact	Houston	Tx	77055
299034	00024733	Coh----	Murphy, James R.	Campaign Data Systems,	\$ 601.87	10/26/05	Direct Mail:voter Contact	Houston	Tx	77055
316001	00057835	Coh----	Schofield, Michael	Campaign Data Systems,	\$ 902.81	1/01/06	Voter Tracking Consulting	Houston	Tx	77055

316001	00057835	Coh---	Schofield, Michael	Campaign Data Systems,	\$ 1,112.00	2/12/06	Voter Tracking Consulting	Houston	Tx	77055
316001	00057835	Coh---	Schofield, Michael	Campaign Data Systems,	\$ 243.56	6/07/06	Voter Tracking Consulting	Houston	Tx	77055
321227	00057713	Jcoh---	Schneider, Michael H.	Campaign Data Systems,	\$ 4,434.00	9/28/06	Mailing Lists	Houston	Tx	77055
320980	00020170	Coh---	Heflin, Talmadge L.	Campaign Data Systems,	\$ 1,807.78	8/15/06	Database Subscription	Houston	Tx	77055
320980	00020170	Coh---	Heflin, Talmadge L.	Campaign Data Systems,	\$ 500.00	9/01/06	Database Subscription	Houston	Tx	77055
320980	00020170	Coh---	Heflin, Talmadge L.	Campaign Data Systems,	\$ 582.50	9/21/06	Database Subscription	Houston	Tx	77055
313105	00054763	Coh---	Larson, Barbara J.	Campaign Data Systems,	\$ 649.50	6/12/06	Consulting	Houston	Tx	77055
365840	00028384	Gpac---	Conservative Republicans Of Harris County Pac,	Campaign Data Systems Llc,	\$ 654.78	2/12/08	Voter Lists	Houston	Tx	77055
368459	00028384	Gpac---	Conservative Republicans Of Harris County Pac,	Campaign Data Systems Llc,	\$ 1,181.53	3/26/08	Voter Lists	Houston	Tx	77055

112 expenditure records found