

Exhibit D

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF FLORIDA
TALLAHASSEE DIVISION

FLORIDA STATE CONFERENCE OF THE
NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE
(NAACP), as an organization and representative
of its members; *et al.*;

Plaintiffs,

v.

CASE NO. 4:07CV-402-SPM/WCS

KURT S. BROWNING, in his official capacity as
Secretary of State for the State of Florida,

Defendant.

_____ /

**DECLARATION OF KEVIN A. HILL IN SUPPORT OF
THE SECRETARY'S MOTION TO DISMISS AND IN OPPOSITION
TO PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to 28 U.S.C. § 1746, Kevin A. Hill submits this Declaration in Support of the Secretary's Motion to Dismiss and in Opposition to Plaintiffs' Motion for Preliminary Injunction.

1. My name is Kevin A. Hill, and I live in Broward County, Florida. My business address is Florida International University, 11200 S.W. 8th Street, Miami, Florida 33199.
2. I am a U.S. citizen and over the age of eighteen. I have never been convicted of a felony, and I have not been declared mentally incompetent by a court.
3. I am an associate professor of Political Science at Florida International University. My curriculum vitae is attached to this Declaration.
4. In an academic capacity, I have carefully observed and analyzed Florida politics since at least 1990.

5. I have reviewed the key papers in this case, including the Complaint, the Motion to Dismiss, the Response and Reply thereto, and Plaintiff's Motion for Preliminary Injunction.

6. I am familiar with the provisions and interrelationships of Florida's Election Code. Based upon my understanding of the operation of Florida's Election Code, Section 97.053(6), Florida Statutes (2007), is a crucial provision that serves important state interests of preventing elections fraud.

7. As an academic observer of Florida's political system, I am familiar with incidents of election fraud in its various manifestations. I have been asked to testify about election fraud in Florida, and I am prepared to do so.

8. Voter fraud in Florida is not merely hypothetical. There have been well documented incidents of voter fraud throughout Florida's history.

9. Eliminating voter fraud in its entirety is not possible. Nevertheless, state regulation can reduce voter fraud by restricting the available common avenues for such fraud. By requiring efforts to verify the identity of voter registration applicants, Florida has made it less likely that false or fraudulent applications will be accepted. Fewer fraudulent registrations will lead to fewer fraudulent votes.

10. By making voter fraud less likely, the challenged law will improve voter confidence, which is critical to successful elections and enhancing public confidence in the electoral process. Voters who believe that elections are not honest and fair will be less likely to participate democratically, fearing their vote will be offset by fraudulent ones.

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

Executed at MIAMI, FLORIDA, Florida, on November 21, 2007.

Kevin A. Hill

Kevin A. Hill

Kevin A. Hill, Ph.D.
Department of Political Science
Florida International University
Miami, FL 33199

Mobile Phone: (954) 547-9008
Office Phone: (305) 348-3291
E-mail: khill@fiu.edu
WWW Home Page: www.fiu.edu/~khill

Education:

Degrees:

1993 Ph.D., Political Science, **University of Florida**. Subfields in Comparative Politics, American Government, and Political Behavior and Methodology.

1991 M.A., Political Science, **University of Florida**.

1988 B.A., *magna cum laude*, **Furman University**. Majors: Political Science and History.

Other Education:

1992 ICPSR Summer Program in Quantitative Methods, **University of Michigan**.
Fields of Concentration: Maximum Likelihood Estimation, Multivariate Statistical Methods, and Categorical Data Analysis.

1991 Certificate in African Area Studies, **University of Florida**.

1989 Visiting Post-Graduate studies, Department of Political and Administrative Studies, **University of Zimbabwe**.

1988 Intensive study of Zulu/Ndebele, **Yale University**.

Publications:

A. Books

1. *Florida's Politics: Ten Media Markets, One Powerful State*. Co-edited with Susan MacManus and Dario Moreno. Tallahassee: Florida Institute of Government. 2004.
2. *Cyberpolitics: Citizen Activism in the Age of the Internet*. Co-authored with John E. Hughes. Lanham, MD: Rowman and Littlefield. 1998.

B. Refereed Journal Articles:

1. Language as a Variable. Co-authored with Dario V. Moreno. *Hispanic Journal of Behavioral Sciences*. May 2002.
2. Racial and Partisan Voting in a Tri-Ethnic Polity: The 1996 Dade County Mayoral Election. Co-authored with Dario V. Moreno and Lourdes Cue. *Journal of Urban Affairs*. 2001.
3. A Community or a Crowd? Ethnic, Partisan, and Regional Bloc Voting in the Florida Legislature, 1989-1996. *Politics and Policy*. Co-authored with Dario V. Moreno. 2001.
4. What Happened to the Democrats in the South? The 1996 House Elections. Co-authored with Nicol C. Rae. *Party Politics*. Winter 2000.
5. Is the Internet an Instrument of Global Democratization? Co-authored with John E. Hughes. *Democratization*. 6(2): 99-127, Summer 1999.
6. Computer-Mediated Political Communication: The USENET and Political Communities. Co-authored with John E. Hughes. *Political Communication*. 14(1): 3-27, Spring 1997.
7. Second Generation Cubans, with Dario Moreno. *Hispanic Journal of Behavioral Sciences*. 18(2): 175-193, May 1996.

4. Florida's Black Voters: Regional Concentration, National Origin Diversity, and Partisanship. In Kevin A. Hill, Susan MacManus, and Dario Moreno, editors. *Florida's Politics: Ten Media Markets, One Powerful State*. Tallahassee: Florida Institute of Government, 2004.
5. South Florida: Florida's "Melting Pot." In Kevin A. Hill, Susan MacManus, and Dario Moreno, editors. *Florida's Politics: Ten Media Markets, One Powerful State*. Tallahassee: Florida Institute of Government, 2004.
6. Battleground Florida. Co-authored with Dario Moreno. In Louis Desipio, editor. *Latino Politics and the 2000 Elections*. Westview, 2004.
7. Does the Creation of Majority Black Districts Aid Republicans? In Susan MacManus, Editor. *Mapping Florida's Political Landscape*. Tallahassee: Florida Institute of Government. 2001.
8. Second Generation Cubans. Co-authored with Dario V. Moreno. In Susan MacManus, Editor. *Mapping Florida's Political Landscape*. Tallahassee: Florida Institute of Government. 2001.
9. "Internet." Encyclopedia entry in *The Encyclopedia of American Studies*. 2000. Grolier.
10. Faith and Election: the Christian Right and Congressional Elections, 1978-1988, with John C. Green and James L. Guth, pp. 103-116. In *Religion and the Culture Wars*, John C. Green, James L. Guth, Corwin E. Smidt, and Lyman A. Kellstedt, editors. Lanham, MD: Rowman and Littlefield. 1996.
11. Agathe Uwilingiyimana. In *Women and the Law, a Bio-Bibliographical Sourcebook*, Rebecca Mae Salokar and Mary L. Volcansek, editors. Westport, CT: Greenwood Press, pp. 323-328, 1996.
12. Sylvie Kanigi. In *Women and the Law, a Bio-Bibliographical Sourcebook*, Rebecca Mae Salokar and Mary L. Volcansek, editors. Westport, CT: Greenwood Press, pp. 118-122, 1996.
13. Glossary of Terms. In *Understanding Contemporary Africa*. Second Edition, April A. Gordon and Donald L. Gordon, editors. Boulder, CO: Lynne Rienner, 1996.
14. Generations and Tolerance: Is Youth Really a Liberalizing Factor? In *After the Boom*, Stephen Bennett and Steven Craig, editors. Lanham, MD: Rowman and Littlefield, pp. 107-126. 1997.

E. Electronic

1. A series of World Wide Web pages for Saint Martin's Press on political science. This group of pages contains approximately 1000 links to Internet political

- presented at the Southern Political Science Association Meeting. January 2005.
3. "Florida's Constitution." Paper presented at the Southern Political Science Association Meeting. January 2004.
 4. Roundtable on Florida Politics. Florida Political Science Association Meeting. March 2002.
 5. Revolt in Florida's Suburbs. Florida Political Science Association Meeting. March 2002.
 6. "Language as a Variable: Ethnicity and Bilingual Polling in Miami-Dade County, Florida." Co-authored with Dario V. Moreno. Paper presented at the Citadel Symposium on Southern Politics. Charleston, SC: March 2000.
 7. Roundtable participant on the panel "V.O. Key's *Southern Politics in State and Nation* a 50th Anniversary Review" at the Southern Political Science Association Meeting. Savannah: November 1999.
 8. Discussant on the panel "Race and Redistricting" at the Southern Political Science Association Meeting. Savannah: November 1999.
 9. Language and Survey Research: Lessons from Miami-Dade County Florida. Coauthored with Dario V. Moreno. Paper presented at the Southern Political Science Association Meeting. Savannah: November 1999.
 10. Are Majority-Minority Districts 'Rotten Boroughs?' Paper presented at the Southwestern Political Science Association Meeting. San Antonio: April 1999.
 11. Chair and Discussant for the panel "Technology and the Decentralization of the Mass Media" at the Midwest Political Science Association Meeting. Chicago: April 1998.
 12. Democratization and the Internet: Political Communication and Anti-Government Messages in Usenet Newsgroups. Paper presented at the Midwest Political Science Association Meeting. Chicago: April 1998.
 13. The End of the White Southern Democrats? Co-authored with Nicol C. Rae. Paper presented to the Citadel Symposium on Southern Politics. Charleston, SC: March 1998.
 14. Discussant for the panel "The Congressional Committee System" at the Florida International University Roundtable on Congressional Politics. Miami: January 1998.

Professional Experience

science resources. Co-authored with John Hughes. 1997.

Invited Presentations

1. "Hurricane Katrina and the Future Politics of New Orleans." Miami City Club. 2005.
2. "The Voting Rights Act and the Rise of the Republican Party in the South." Yale University Conference on the 40th anniversary of the Voting Rights Act. April 2005.
3. "How Republicans Win Elections in Florida." Miami City Club. 2004.
4. "Florida Politics and the Internet." League of Women Voters, Orlando. 2003.
5. "Election 2002." Miami City Club. 2002.
6. "The History of the Democratic Party in Florida." Weston Democratic Club. February 2002.
7. Lecture: "Politics and New Information Technology." Palm Beach Community College. June 2000.
8. Lecture: "Politics and the Internet." Florida Atlantic University Department of Communications. April 1999.
9. Lecture to the American Association of University Women on African politics (May 1996).
10. LECTURED USIA-sponsored visiting Russian journalists on the United States political party system (March 1996).
11. Lecture to the American Association of University Women on "Elections in the New South Africa" (March 1994).

Recent Conferences

1. "Do Voters Know Their Local Officials Better Than Their State Counterparts?" Co-authored with Kathryn A. DePalo. Paper presented at the Florida Political Science Association Meeting. Orlando, April 2007.
2. "Hispanics and National Origin." Co-authored with Kathryn A. DePalo. Paper

Site Coordinator, Florida Political Science Association 2006 meeting at Florida International University.

Undergraduate Advisor, Department of Political Science, Florida International University, 1999-2002; 2005-present.

Associate Professor of Political Science, Florida International University, 1998-present.

Assistant Professor of Political Science, Florida International University, 1993-1998.

Public Opinion Pollster, Campaign Data, Inc. Have fielded and analyzed 150+ public opinion polls in Miami-Dade, Broward, Monroe, Collier, Hendry, and Palm Beach counties, as well as nationwide, 1996-2005.

Webmaster and Web Site Creator, Department of Political Science, and Jack Gordon Institute for Public Policy and Citizenship Studies, both at Florida International University.

Research Associate at the University of Zimbabwe, Department of Political and Administrative Studies, 1992-1993. Affiliated with this department while doing field work for dissertation.

Associate Director of the Florida Consortium for Political Research, August 1990-May 1992. Duties included maintaining the machine readable data archives of the nation's fifth largest consumer of ICPSR social science data, maintaining two computer networks, and offering computer and statistical consultation to faculty, staff, and graduate students.

Tutorials Leader for the Development Administration course for advanced undergraduates, University of Zimbabwe, 1989. Directed "British style" tutorials for three sections of thirty students each. Duties included stimulating debates about development topics, leading discussions of working papers, and grading undergraduate research. Some lectures were also offered.

Research Assistant to Dr. Kenneth Wald, University of Florida, August-December 1988; and to Dr. Michael Martinez, Jan.- May 1990.

Legislative Assistant at the Washington Office on Africa, a lobbying organization in Washington, DC; March-June 1987.

Honors and Awards

Faculty Senate Excellence in Undergraduate Advising Award, Florida

International University, 2001.

Teaching Incentive Program (TIP) Award for excellence in teaching, Florida International University, 1997.

Alexander George Best Graduate Student Paper Award, Foreign Policy Analysis Section, International Studies Association, 1991.

Bradshaw-Feaster Award for General Excellence, Ulmer Political Science Medal, and Phi Beta Kappa membership, Furman University, June 1988.

Finalist for the Rhodes Scholarship in 1987. Won the South Carolina competition, and was one of only 100 undergraduate students in the U.S. to reach the final round of selection.

Research Grants/Contracts

City of Key Biscayne Vision 2004 Report. 2004. \$15,000.

City of Miami Redistricting. 2003. \$40,000.

Fulbright Fixed Sum Grant for research in Zimbabwe, \$19,955, 1992-1993.

National Science Foundation Grant # SES-9123116 for research in Zimbabwe, \$8,000, 1991.

Expert Witness

Carollo v. Suarez (state) voter fraud in the city of Miami, 1998.

Martinez v. Bush (federal) redistricting for the state of Florida, 2002.

Narvaez v. Hialeah Canvassing Board (state and federal), 2004.

State of Florida v. Juri, 2005