

EXHIBIT 1

Declaration of Leland Beatty

1. My name is Leland Beatty. I am a resident of Austin, TX. I have previously submitted declarations in this case which detailed a match between the Wisconsin voter registration database and the Wisconsin driver's license and state ID databases, which demonstrated that Wisconsin minority voters are at a substantial disadvantage under Wisconsin's voter ID law, and that the effect of that law imprints an unavoidable disparate impact on minority election participation.
2. I have been asked to match the current Wisconsin voter registration database and the current Wisconsin driver's license and state ID databases to determine if there has been a substantial change in the disparate adverse impact on minority voters.

Conclusions

3. Current data support the prior conclusions that Non-White Wisconsin residents will be significantly and adversely impacted by the Wisconsin voter identification law, as well as the other conclusions presented in the prior declarations. Non-White registered voters are significantly less likely to possess a driver's license or state identification that matches their voter registration data.
4. Hispanic voters are 2.3 times as likely as White voters to not possess a matching driver's license or state ID; Asian voters 1.5 times as likely as White voters; and African American voters 1.4 times as likely as White voters.

Methodology

5. I used the same process and methods detailed in my earlier declarations, adding a match based on first name, middle initial, last name and date of birth, as well as attempting to match various combinations of first and last names which include multiple words.
6. 317,735 registered voters did not match a driver's license or state ID. These voter records were submitted to Ethnic Technologies, a company that maintains proprietary data on race and ethnicity, to identify the race of individuals based on identifying data contained in the Wisconsin voter registration database.
7. I have worked with Ethnic Technologies data on many occasions in the past, and have found their work to be reliably accurate on each occasion. I have had the opportunity to review the onomastic research on which their methods are based, and have found the research to strongly support the Ethnic Technologies methodology. For these reasons, and as I explained more fully in the Reply Declaration of Leland Beatty that I submitted back in April, 2012, I am confident using their work product in both my marketing and political work.
8. 295,796 submitted voters were returned from Ethnic Technologies with race identification (93.1%). Race for 21,939 voters could not be determined.

9. The end result of my work is summarized in the following table:

License and State ID Records, by Race				
Race	Total Voters	Total Voters Matched to DL / ID Record	Total Unmatched to DL / ID Record, Race Identified	Share of Race Without Matching DL / ID
ASIAN	44,310	38,919	5,391	12.2%
BLACK	199,398	176,519	22,879	11.5%
HISPANIC	62,490	50,498	11,992	19.2%
INDIAN	17,934	16,797	1,137	6.3%
WHITE	3,049,615	2,795,218	254,397	8.3%
Total	3,373,749	3,077,953	295,796	8.8%

10. I declare under penalty of perjury that the forgoing is true and correct. Executed on October 28, 2013 in Austin, Texas.



Leland Beatty