FYI all counties not covered by County staff are covered for five days with the exception of Mason County which only has two at present. Major progress.
10-4, will forward the work sheet shortly, most DL folks out last Friday, so catching up this morning.

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robert.bodisch.sle@dhs.sgov.gov

Duke,

Just checking on week’s end update you mentioned previously. Do we have a timeline for when the non-participating counties will have the mobile stations? Thanks.

Mac

Kathy, Macgregor,

Of the 36 counties with no driver license office or permanent EIC program, we have secured Interagency Cooperation Contracts with three counties (Aransas, Camp & Somervell) and they are scheduled for training and deployment of the EIC equipment tomorrow and Thursday.

Several appointments and negotiations are taking place this week between DPS personnel and county officials in the remaining 33 counties. Should have an update by week’s end and we anticipate picking up several more of these counties.
We now have 23 Secretary of State personnel attending the EIC training tomorrow.

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Plaintiff Exhibit
PL1075

WITHDRAWN
So is it necessary to have the multifunction printers/scanners in addition to the fingerprint scanners?

From: Bodisch, Robert [mailto:Robert.Bodisch@dps.texas.gov]
Sent: Tuesday, September 17, 2013 11:17 AM
To: MacGregor Stephenson; 'Coby Shorter'; Cesinger, Katherine; Peters, Joe; Bodisch, Robert
Subject: RE: EIC Mobile Units

Mac, We will not be doing paper prints. The fingerprint scanner was ordered and will be here tomorrow and will be tested tomorrow. We have high confidence that it will work as it is FBI complaint. Scott is moving ahead and ordering the scanners today. DPS does not have mobile scanners for the 25 Mobile Teams, hence we are having to assemble 25 deployment kits. All is moving forward.

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robert.bodisch.sle@dhs.sgov.gov

From: MacGregor Stephenson [mailto:macgregor.stephenson@governor.state.tx.us]
Sent: Tuesday, September 17, 2013 11:08 AM
To: Bodisch, Robert; 'Coby Shorter'; Cesinger, Katherine; Peters, Joe
Subject: RE: EIC Mobile Units

Please help me out here, because I was under the understanding from you all yesterday that the specs were all completed. If we cannot get these finalized by 3:00 today, I would like to meet with the individuals from DPS and SOS that are establishing the specifics at 3:30 in my office so that we can get this done. Just so that I am clear, if we are doing paper fingerprints and then scanning, do we need both printer/scanners and fingerprint readers? Also, just to be clear here, does DPS have any fingerprint scanners that could be used for these efforts? Time is marching on, and I want to make sure that we are getting this figured out today. If DPS doesn’t know what the specifications are for the scanners or SOS has some questions about them, could someone please help me understand the issues?

Thank you.

MacGregor

From: Bodisch, Robert [mailto:Robert.Bodisch@dps.texas.gov]
Sent: Tuesday, September 17, 2013 10:54 AM
To: Coby Shorter; MacGregor Stephenson; Cesinger, Katherine; Peters, Joe
Joe Peters is in touch with Scott on all these items.

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Assistant Director/Chief of Staff  
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Texas Department of Public Safety  
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Austin, Texas 78773  
512-424-2368  
robert.bodisch@dps.texas.gov  
robert.bodisch.sle@dhs.sgov.gov

From: Coby Shorter [mailto:CShorter@sos.texas.gov]  
Sent: Tuesday, September 17, 2013 10:34 AM  
To: MacGregor Stephenson; Bodisch, Robert; Cesinger, Katherine; Peters, Joe  
Subject: RE: EIC Mobile Units

We still do not have specs on the following items:
  1) The multifunction printers/scanners (We had specs for the original request, but we have been told that those originally requested are inadequate.)
  2) The digital fingerprint readers
  3) Photo Backdrop specs

No specifics have been provided as to the type of secure storage boxes, tripods, surge protectors and USB multi-hubs; therefore, we will proceed with making those selections based on what we think will work. As for the three items listed above, if specs are not forthcoming, please let us know and we will proceed with equipment that should interface with the computers previously requested.

From: MacGregor Stephenson [mailto:macgregor.stephenson@governor.state.tx.us]  
Sent: Monday, September 16, 2013 8:40 AM  
To: 'Bodisch, Robert'; Coby Shorter; 'Cesinger, Katherine'; 'Peters, Joe'  
Subject: RE: EIC Mobile Units

Duke,

I have not seen the necessary specifications for the cameras and document scanners so that SOS can put in an order. Have those been provided separately?

Thanks.

Mac

From: Bodisch, Robert [mailto:Robert.Bodisch@dps.texas.gov]  
Sent: Monday, September 16, 2013 6:33 AM  
To: Bodisch, Robert; cshorter@sos.state.tx.us; Cesinger, Katherine; Peters, Joe; MacGregor Stephenson  
Subject: EIC Mobile Units  
Importance: High

Coby, I have been informed that the price for the scanners is incorrect. Will get you the corrected number this
From: Bodisch, Robert  
To: cshorter@sos.state.tx.us; Bodisch, Robert; Cesinger, Katherine; Peters, Joe; Watkins, Paul; Rodriguez, Tony; MacGregor Stephenson  
Subject: EIC Mobile Units

Coby, Let's visit first thing Monday morning, looks like we can get the price down even more. Overtime will still be the issue.

Below is the estimated cost for 25 Mobile Units:

<table>
<thead>
<tr>
<th>Item</th>
<th>Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Computers</td>
<td>$34,745.55</td>
</tr>
<tr>
<td>Multi-Function Document Scanners</td>
<td>$2,547.00</td>
</tr>
<tr>
<td>Fingerprint Ink Pads</td>
<td>$625.00</td>
</tr>
<tr>
<td>Cameras</td>
<td>$2,594.77</td>
</tr>
<tr>
<td>Banners</td>
<td>$5,000.00</td>
</tr>
<tr>
<td>Backdrops</td>
<td>$4,200.00</td>
</tr>
<tr>
<td>Secure Storage Lock Boxes</td>
<td>$2,500.00</td>
</tr>
<tr>
<td>Tripods</td>
<td>$625.00</td>
</tr>
<tr>
<td>Surge Protectors/Cords</td>
<td>$625.00</td>
</tr>
<tr>
<td>USB Multi-Hub</td>
<td>$750.00</td>
</tr>
</tbody>
</table>

**TOTAL**  
$54,212.32
From: Coby Shorter
To: MacGregor Stephenson
Sent: 2/15/2014 6:04:34 PM
Subject: Re: EIC Locations for SOS Staff

Everything now looks good for next week.

Sent from my iPhone

> On Feb 15, 2014, at 6:01 PM, "MacGregor Stephenson" <macgregor.stephenson@governor.state.tx.us> wrote:
> Any word?
>
> On Feb 14, 2014, at 8:17 PM, "Coby Shorter" <CShorter@sos.texas.gov> wrote:
> Sent from my iPhone
> Begin forwarded message:
> From: Louri O'Leary <LO'Leary@sos.texas.gov>
> Date: February 14, 2014 at 8:15:36 PM CST
> To: "robert.Bodisch@dps.texas.gov", Coby Shorter <CShorter@sos.texas.gov>
> Subject: FW: EIC Locations for SOS Staff
> Hi Coby and Duke
> The Cameron County, Denton County and City of Trinity sites were sent Feb 13 to DPS with the 5 day request in mind. (see attached)
> I realize the tight deadline, and if the locations can be confirmed before Sunday 2.16 by DPS then SOS staff can travel and man the EIC mobile station with the DPS representative.
> If not we can move to the following week however I need to contact county person for re-arrangements and tell SOS staff not to travel.
> Duke - please let us know if DPS can check out the locations before Feb 16 or if we need to make changes.
> 1) Cameron (Harlingen City Hall & Cameron County Dancy Building)
> 2) Denton (TWU - Student Union Building)
> 3) City of Trinity (Fire Station)
> Thanks
> Louri
From: Louri O'Leary
Sent: Thursday, February 13, 2014 4:34 PM
To: Bell, Stephen; Krueger, Kristopher
'manuel.rodriguez@dps.texas.gov'
Subject: EIC Locations for SOS Staff

Added Montgomery county.
<EIC Locations for SOS Staff.docx>
Tony is available and in the office.

Robert J. Bodisch  
Assistant Director/Chief of Staff  
Texas Homeland Security  
Texas Department of Public Safety  
5805 N. Lamar Blvd., Bldg. A  
Austin, TX 78752  
512-424-2368 w  
rbert.bodisch@dps.texas.gov

On Oct 17, 2013, at 11:23 AM, "MacGregor Stephenson" <mgregor.stephenson@governor.state.tx.us> wrote:

Thanks. Will you give me a call when you all get out or I can talk with Tony if that would be better.

---

Mac, this is the EIC schedule as of this morning's conference call with all our regional DL representatives. We have update conference calls everyday at 8:30 am and 4:00 pm since things change and we remain flexible to meet changes or pursue alternate courses of action.

Right now things are on track.

I am in the Public Safety Commission meeting today but hope it won't go past 3:00 pm.

Robert J. Bodisch  
Assistant Director/Chief of Staff  
Texas Homeland Security  
Texas Department of Public Safety  
5805 N. Lamar Blvd., Bldg. A  
Austin, TX 78752  
512-424-2368 w  
rbert.bodisch@dps.texas.gov

Begin forwarded message:

From: "Rodriguez, Tony" <Tony.Rodriguez@dps.texas.gov>  
Date: October 17, 2013 at 11:11:59 AM CDT  
To: "Bodisch, Robert" <Robert.Bodisch@dps.texas.gov>, "Peters, Joe" <Joe.Peters@dps.texas.gov>, "Watkins, Paul" <Paul.Watkins@dps.texas.gov>

Per Request

v/r
Customer Operations Senior Manager – South and West
Driver License Division
Texas Department of Public Safety
tony.rodriguez@dps.texas.gov
512.424.5657 (O)
512.739.9709 (C)
512.424.5233 (F)
Ball is in your court. Contact Judy or Aimee directly at CJD.

Thanks.

Joe

Joe Peters
Assistant Director
Texas Department of Public Safety
Driver License Division
P.O. Box 4087
Austin, TX 78773
Office: 512-424-5899
joe.peters@dps.texas.gov

Robert Bodisch
Assistant Director/Chief of Staff
Texas Homeland Security
Texas Department of Public Safety
P. O. Box 4087
Austin, Texas 78773
512-424-2368
robert.bodisch@dps.texas.gov
robert.bodisch.sle@dhs.sgov.gov
Duke,

Just received word from MacGregor that we're a go on the grant (up to $200K) to DPS for Voter ID equipment. We'll create the app in eGrants and you all will need to complete it. Get with Aimee and Judy on the details and we'll get this thing rolling.

-Christopher
Confirmed numbers, 79 counties with no DL office is the correct number. What OAG might not understand is that we are currently pulling trained customer service representatives out of busy DL offices to fill the 25 mobile teams. We have had to order 137 CSRs to work on Saturdays because they are not interested in working overtime. Lots of internal grumbling about waste of tax dollars. Not sure where will get 175 trained CSRs to man the 79 counties where the numbers aren’t. This also doesn’t address the equipment, transportation and overtime costs. We do not have the funds for what we are currently doing. Pulling all the CSRs out of existing DL offices will severely degrade our DL mission. Legislators will be fuming when their constituents start calling them and complain about the lines wrapped around the DL offices. Steve is traveling to the border with couple of Senators and cannot make the meeting. I will be there. See attached

Robert J. Bodisch
Assistant Director/Chief of Staff,
Texas Homeland Security
Texas Dept. of Public Safety
512-424-2368 w

Begin forwarded message:

From: "Nolte, Candace" <Candace.Nolte@dps.texas.gov>
Date: September 19, 2013 at 17:34:50 CDT
To: "Bodisch, Robert" <Robert.Bodisch@dps.texas.gov>
Subject: FW: Voter ID Information requested-1 of 2

No counties list included.

From: Peters, Joe
Sent: Wednesday, July 03, 2013 4:05 PM
To: McCraw, Steven; MacBride, Cheryl; Bodisch, Robert; Cesinger, Katherine; Nolte, Candace
Subject: FW: Voter ID Information requested-1 of 2

The attached is info that OAG requested through OGC in preparation for the pending Voter ID litigation. Thought some of you might find the updated data and maps useful. Great work by Janie and her team and on short notice! This is the first of two emails.

Joe Peters
Assistant Director
Driver License Division
Texas Department of Public Safety
P.O. Box 4087
Austin, TX 78773
Office: 512-424-5899
joe.peters@dps.texas.gov
Mac, aside from these 50 DL offices opened tomorrow and every Saturday between now and Nov. 2, the SOS will provide 25 EIC Mobile units. We hope to deploy these as soon as we receive them from SOS. We still have the 5 trailer Mobile Units that we can deploy as soon as we receive locations from SOS. I am pulling together a cost estimate for overtime which we do not have budgeted in our FY 14 & 15 appropriations. I hope to have that estimate for you later this afternoon.

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FOR IMMEDIATE DISTRIBUTION
September 13, 2013

Select Driver License Offices Open Saturdays to Issue Election Identification Certificates

No driver license transactions will be conducted on Saturdays
AUSTIN – The Texas Department of Public Safety (DPS) is offering Saturday hours at nearly 50 driver license offices across the state as part of an ongoing effort to provide Election Identification Certificates (EICs) to Texans in need of proper identification required to vote in elections in Texas.

Select offices will be open on Saturdays from 10 a.m. – 2 p.m. beginning September 14 through November 2, to allow residents to apply for EICs only. No other transactions will be conducted during Saturday business hours. In addition to the Saturday hours, applicants may apply for an EIC at all Texas driver license offices during regular business hours Monday – Friday.

For a list of offices that will be open on Saturdays to issue EICs, visit http://www.dps.texas.gov/DriverLicense/documents/openCtvOfcs.pdf.

Most residents already have an acceptable form of photo identification needed for voting and will not need or qualify for an EIC. If an applicant already has any of the following documents, they are not eligible to receive an EIC:

- Texas driver license – unexpired or expired less than 60 days at the time of voting
- Texas personal identification card – unexpired or expired less than 60 days at the time of voting
- U.S. passport book or card – unexpired or expired less than 60 days at the time of voting
- Texas concealed handgun license – unexpired or expired less than 60 days at the time of voting
- U.S. Military identification with photo – unexpired or expired less than 60 days at the time of voting
- U.S. Citizenship Certificate or Certificate of Naturalization with photo

To apply for an EIC, applicants must visit a driver license office and complete an Application for Texas Election Certificate (DL-14C).

To qualify for an EIC, an applicant must:
- Bring documentation to the office to verify U.S. citizenship
- Bring documentation to the office to verify Identity
- Be eligible to vote in Texas (Bring a valid voter registration card or submit a voter registration application through the Texas Department of Public Safety at the office)
- Be a Texas resident
- Be 17 years and 10 months or older

To avoid delays or complications, DPS urges potential applicants to make sure they have the necessary documentation before arriving at the office.

The EIC receipt an individual receives will include their photo and can be used for voting until the permanent card is delivered by mail.

The EIC is free of charge to qualifying applicants and is valid for six years. There is no expiration date for an EIC for citizens 70 years of age or older. The EIC can only be used for the purpose of voting in an election and may not be used as personal identification.

Texans with a documented disability may apply at their county voter registrar for a permanent exemption from the photo ID requirement. If approved, they will not need a photo ID to vote. Also, if individuals are voting by mail, they do not have to submit a photo ID.

For more information on the requirements, exemptions and process for obtaining an EIC, please visit: http://www.txdps.state.tx.us/DriverLicense/electionID.htm.

For more information on voting in Texas, visit the Secretary of State’s website: www.votetexas.gov.
Thank you very much for the work. I appreciate the time and resources required.

On Oct 14, 2013, at 5:49 PM, "Bodisch, Robert"
<Robert.Bodisch@dps.texas.gov<mailto:Robert.Bodisch@dps.texas.gov>> wrote:

Per conversation, Attached please find the current status of (79) county participation in the EIC effort. We have training scheduled for Thursday at various sites around the state. Regardless of where we are with the MOUs, the stations will process the EICs as soon as they are trained and we will let the MOUs catch up, but not mail the EICs until the MOU is received. As soon as the yellow counties receive their training by Friday, they will all turn green. The 38 blue counties will be staffed by DPS personnel so no problem there. The one grey county is a DPS scheduled office and we are adding the extra days to ensure at least 5 days coverage and it will also be available on the scheduled days as well.

The team is still working on the extended hours schedule. Will forward when available.

In addition, our Saturday operations continue at 49 DPS locations, and our 25 EIC Mobile units continue deployed and on schedule.

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Texas Department of Public Safety
P. O. Box 4087
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robert.bodisch.sle@dhs.sgov.gov<mailto:robert.bodisch.sle@dhs.sgov.gov>

<EIC Counties with No Driver License Office (14 Oct 2013).pdf>
Administrative License Revocation (ALR) Program

The Administrative License Revocation (ALR) Program is a civil administrative process unrelated to criminal court proceedings. The ALR Program applies to individuals arrested for Driving While Intoxicated (DWI) or Boating While Intoxicated (BWI) and refuse to take or fail a blood or breath test.

Individuals who refuse or fail a blood or breath test following an arrest for DWI may have their driver license suspended from 90 days to 2 years. Refusal or failure of this test will also result in an automatic one-year disqualification for individuals with a commercial driver license.

ALR Process for DWI or BWI

If a law enforcement officer has reason to believe a driver is impaired, a set of field sobriety tests will be administered. If the driver performs poorly on the field sobriety tests then the driver will be arrested for DWI or BWI.

1. The driver is asked to take a breath or blood test to measure his/her blood alcohol concentration (BAC) level.
2. The driver is served a notice that his/her driver license will be suspended if he/she refuses to take or fails the field sobriety test. (Registering a 0.08 BAC or greater is considered failing.) The individual then has 15 days from the date the suspension notice is served to request a hearing.
   a. If a hearing is not requested, the suspension goes into effect on the 40th day after the notice was served. (This is usually 40 days after the arrest.)
   b. For various reasons, including delayed or missing paperwork, the 40 days can be retroactive or back-dated from the date of notice.
3. The law enforcement officer will take the individual's driver license and issue a temporary driving permit.
4. A $125 reinstatement fee is required prior to the renewal or issuance of a driver license.

Hearings for ALR

In certain circumstances, individuals may be eligible to request a hearing for an administrative license revocation (ALR) to contest the suspension of their driver license. If the request is submitted within the required 15 days, DPS will schedule a hearing.
IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

__________________________________________

MARC VEASEY, JANE HAMILTON, )
SERGIO DELEON, FLOYD J. CARRIER, )
ANNA BURNS, MICHAEL MONTEZ, )
PENNY POPE, OSCAR ORTIZ, KOBY )
OZIAS, JOHN MELLOR-CRUMLEY, PEGGY )
HERMAN, EVELYN BRICKNER, GORDON )
BENJAMIN, KEN GANDY, LEAGUE OF )
UNITED LATIN AMERICAN CITIZENS )
(LULAC), AND DALLAS COUNTY, TEXAS, )

Plaintiffs, )

v. )

RICK PERRY, Governor of Texas; and JOHN )
STEEN, Texas Secretary of State, )

Defendants. )

__________________________________________

UNITED STATES OF AMERICA, )

Plaintiffs, )

TENAS LEAGUE OF YOUNG VOTERS )
EDUCATION FUND AND IMANI CLARK, )

Plaintiff-Intervenors,

TENAS ASSOCIATION OF HISPANIC )
COUNTY JUDGES AND COUNTY )
COMMISSIONERS, AND HIDALGO )
COUNTY, )

Plaintiff-Intervenors,

v.

STATE OF TENAS, JOHN STEEN, in his )
official capacity as Texas Secretary of State; )
and STEVE McCRAW, in his official capacity )
as Director of the Texas Department of Public )
Safety,

Defendants.

__________________________________________

CIVIL ACTION NO.
2:13-CV-193 (NGR) [Lead case]

CIVIL ACTION NO.
2:13-CV-263 (NGR) [Consolidated case]
TEXAS STATE CONFERENCE OF NAACP BRANCHES; and the MEXICAN AMERICAN LEGISLATIVE CAUCUS OF THE TEXAS HOUSE OF REPRESENTATIVES,

Plaintiffs,

v.

JOHN STEEN, in his official capacity as Secretary of State of Texas; and STEVE McCRAW, in his official capacity as Director of the Texas Department of Public Safety,

Defendants.

BELINDA ORTIZ, LENARD TAYLOR, EULALIO MENDEZ JR., LIONEL ESTRADA; ESTELA GARCIA ESPINOSA, LYDIA LARA, MARGARITO MARTINEZ LARA, MAXIMINA MARTINEZ LARA, AND LA UNION DEL PUEBLO ENTERO, INC.

Plaintiffs,

v.

STATE OF TEXAS, JOHN STEEN, in his official capacity as Texas Secretary of State; and STEVE McCRAW, in his official capacity as Director of the Texas Department of Public Safety,

Defendants.

CIVIL ACTION NO. 2:13-CV-291 (NGR) [Consolidated case]

CIVIL ACTION NO. 2:13-CV-348 (NGR) [Consolidated case]

DEFENDANTS’ OBJECTIONS AND RESPONSES TO VEASEY-LULAC PLAINTIFFS’ FIRST SET OF REQUESTS FOR ADMISSION

TO: All Plaintiffs and Plaintiff-Intervenors, by and through their attorneys of record.

Pursuant to Rule 36 of the Federal Rules of Civil Procedure, the State of Texas, Rick Perry, John Steen and Steve McCraw, serve these Objections and Responses to Veasey-LULAC Plaintiffs’ First Set of Requests for Admission.
Respectfully submitted,

GREG ABBOTT  
Attorney General of Texas

DANIEL T. HODGE  
First Assistant Attorney General

JONATHAN F. MITCHELL  
Solicitor General

J. REED CLAY, JR.  
Special Assistant and Senior Counsel  
to the Attorney General  
Southern District of Texas No. 1160600

/s/ John B. Scott  
JOHN B. SCOTT  
Deputy Attorney General for Civil Litigation  
Southern District of Texas No. 10418  
Texas State Bar No. 17901500  
ATTORNEY-IN-CHARGE

G. DAVID WHITLEY  
Assistant Deputy Attorney General  
Southern District of Texas No. 2080496

STEPHEN RONALD KEISTER  
Assistant Attorney General  
Southern District of Texas No. 18580

JENNIFER MARIE ROSCETTI  
Assistant Attorney General  
Southern District of Texas No. 224780

LINDSEY ELIZABETH WOLF  
Assistant Attorney General  
Southern District of Texas No. 2292940

209 West 14th Street  
P.O. Box 12548  
Austin, Texas 70711-2548  
(512) 475-0131
1. Admit that Attorney General Greg Abbott announced publicly on June 25, 2013 that SB 14 would take effect immediately.

**OBJECTION:** The language “announced publicly” and that “SB14 would take effect immediately” is undefined, vague, ambiguous and confusing rendering this request difficult to fairly admit or deny. Further, this request seeks an admission that is not relevant to this cause of action and is not reasonably calculated to lead to the discovery of admissible evidence; therefore, it is beyond the scope of permissible discovery. Further, the Plaintiffs have failed to attach a written or otherwise recorded statement of Attorney General Greg Abbott as an exhibit to this request; therefore, the Defendants have no basis for judging the correctness or the accuracy of the Plaintiffs’ characterization of any statements of the Attorney General. Any admission would be based upon conjecture, speculation and hearsay as opposed to knowledge of facts. Further, Defendants object as this request calls upon them to make an admission with respect to the conduct, actions or statements of an entity or person that is not a party defendant to this cause of action. Such an admission would be based upon speculation and/or hearsay, not knowledge of facts.

Subject to and without waiving the above objections, and as demonstrated above, the Defendants do not have sufficient knowledge to admit or deny; therefore, the Defendants deny this request.

2. Admit that, after June 26, 2013, some employees of the Office of the Texas Governor participated in conversations (telephonically, electronically, or in-person) about the implementation of the Secretary of State’s mobile EIC program.

**OBJECTION:** The language “after June 26, 2013”, “some employees”, “participated in conversations”, and “the Secretary of State’s mobile EIC program” is undefined, vague, ambiguous, and confusing rendering this request difficult to fairly admit or deny. The request fails to identify any specific employee, specific conversation, or date and time of any conversation for which the Plaintiffs are seeking an admission; thus, rendering this request difficult to fairly admit or deny. Further, this request is beyond the scope of permissible discovery as it seeks an admission that is not relevant to this cause of action and is not reasonably calculated to lead to the discovery of admissible evidence. Defendants further object
to this request to the extent it seeks an admission with respect to information subject to the attorney-client privilege, deliberative process privilege, joint defense, and attorney work-product doctrine.

Subject to and without waiving the above objections, and as demonstrated above, the Defendants do not have sufficient knowledge to admit or deny; therefore, the Defendants deny this request.

3. Admit that, to obtain a license to carry a concealed handgun in Texas, a person does not need to be a United States citizen.

OBJECTION: The language used in this request is vague, ambiguous, misleading, incomplete, and confusing rendering this request difficult to fairly admit or deny. Further, this request is beyond the scope of permissible discovery as it seeks an admission that is not relevant to this cause of action and is not reasonably calculated to lead to the discovery of admissible evidence. The Defendants further object as Federal Rules of Civil Procedure, Rule 36, prohibits requests for admissions that require a party to admit or deny the truth of a legal conclusion.

Subject to and without waiving the above objections, the Defendants deny the request.

4. Admit that, to obtain a license to carry a concealed handgun in Texas, an applicant does not need to provide documents to DPS to prove U.S. citizenship.

RESPONSE: Deny

5. Admit that the Secretary of State’s Office received information that some individuals who applied for EICs were required to submit fingerprints to DPS to obtain an EIC.

RESPONSE: Deny

6. Admit that the Secretary of State’s Office received information that some individuals who made inquiries about EICs to the Secretary of State’s Office
or the Department of Public Safety were informed that applicants needed to submit fingerprints to DPS to obtain an EIC.

RESPONSE: Deny

7. Admit the Excel spreadsheet represented by placeholder document TEX00300316 is a spreadsheet listing by county, city, and zip code the number of Texas registered voters who were not matched to records in the Department of Public Safety databases.

RESPONSE: Deny

8. Admit that the Excel spreadsheet represented by placeholder document TEX00300316 represents that in zip code 79938 (El Paso, El Paso County, Texas), 1097 registered voters were not matched to records in the Department of Public Safety databases.

RESPONSE: Deny

9. Admit that the Excel spreadsheet represented by placeholder document TEX00300316 was provided to some or all counties on or around August or September of 2013.

RESPONSE: Deny

10. Admit that when applicants for EICs submit the necessary documentation at a Department of Public Safety Office, they cannot receive their official ID card at that time, and must wait to receive the card by mail.

RESPONSE: Deny

11. Admit that TEX00460880 represents that ARC Acquisition provided a quote for the Department of Public Safety of $101.88 per Canon Powershot A2500 16 MP digital camera.
OBJECTION: The language used in this request is vague, ambiguous, misleading, incomplete, and confusing rendering this request difficult to fairly admit or deny. Further, the request as worded seeks an admission with respect to incomplete information and is misleading as it fails to represent the complete terms of the “quote”.

Subject to and without waiving the above objections, the Defendants state only that the referenced document sets forth the complete terms of a “quote” given to the Department of Public Safety.

12. Admit that individuals may not obtain a fee waiver from DSHS for a birth certificate for the purposes of obtaining an EIC if they person applies for the birth certificate on Texas.gov.

OBJECTION: The language used in this request is undefined, vague, ambiguous, and confusing rendering this request difficult to fairly admit or deny. Further, this request seeks to have the Defendants make an admission with respect to the operations and procedures of a state entity that is not a party to this cause of action. Further, the Defendants object as Federal Rules of Civil Procedure, Rule 36, prohibits requests for admission that require a party to admit the truth of a legal conclusion.

Subject to and without waiving the above objections, and as demonstrated above, the Defendants do not have sufficient knowledge to admit or deny; therefore, the Defendants deny the request.

13. Admit that individuals may not obtain a fee waiver from DSHS for a birth certificate for the purposes of obtaining an EIC if the person applies by mail, using form VS 142.3.

OBJECTION: The language used in this request is undefined, vague, ambiguous, and confusing rendering this request difficult to fairly admit or deny. Further, this request seeks to have the Defendants make an admission with respect to the operations and procedures of a state entity that is not a party to this cause of action. Further, the Defendants object as Federal Rules of Civil Procedure, Rule 36, prohibits requests for admission that require a party to admit the truth of a legal conclusion.
Subject to and without waiving the above objections, and as demonstrated above, the Defendants do not have sufficient knowledge to admit or deny; therefore, the Defendants deny the request.

14. Admit that individuals seeking a fee waiver from DSHS for issuance of a birth certificate for the purposes of obtaining an EIC must pay a statutorily required fee of $2.00.

OBJECTION: The language used in this request is undefined, vague, ambiguous, and confusing rendering this request difficult to fairly admit or deny. Further, this request seeks to have the Defendants make an admission with respect to the operations and procedures of a state entity that is not a party to this cause of action. Further, the Defendants object as Federal Rules of Civil Procedure, Rule 36, prohibits requests for admission that require a party to admit the truth of a legal conclusion.

Subject to and without waiving the above objections, and as demonstrated above, the Defendants do not have sufficient knowledge to admit or deny; therefore, the Defendants deny the request.

15. Admit that birth certificates issued to individuals with a fee waiver from DSHS are marked or stamped to indicate that the birth certificate may only be used for purposes of applying for an EIC.

OBJECTION: The language used in this request is undefined, vague, ambiguous, and confusing rendering this request difficult to fairly admit or deny. Further, this request seeks to have the Defendants make an admission with respect to the operations and procedures of a state entity that is not a party to this cause of action. Further, the Defendants object as Federal Rules of Civil Procedure, Rule 36, prohibits requests for admission that require a party to admit the truth of a legal conclusion.

Subject to and without waiving the above objections, and as demonstrated above, the Defendants do not have sufficient knowledge to admit or deny; therefore, the Defendants deny the request.
16. Admit that the Secretary of State’s office advised county election officials not to distribute the New Notice of Required Identification described in TEX00048361, or any similar notice, to voters who appeared at the polls for the November 2011 elections.

**OBJECTION:** The language “New Notice of Required Identification” and “or any similar notice” is undefined, vague, ambiguous, and confusing rendering this request difficult to fairly admit or deny.

Subject to and without waiving the above objections, the Defendants deny the request.

17. Admit that the Secretary of State’s Office did not instruct county election officials to distribute the New Notice of Required Identification described in TEX00048361, or any similar notice, to voters who appeared at the polls for any elections in 2012.

**OBJECTION:** The language “New Notice of Required Identification” and “or any similar notice” is undefined, vague, ambiguous, and confusing rendering this request difficult to fairly admit or deny.

Subject to and without waiving the above objections, the Defendants deny the request.

18. Admit that the Secretary of State was statutorily required to conduct an education campaign about SB 14’s photo ID requirements.

**OBJECTION:** The language “was statutorily required”, “education campaign”, and “about SB14’s photo ID requirements” is undefined, vague, ambiguous, and confusing rendering this request difficult to fairly admit or deny. Further, Federal Rules of Civil Procedure, Rule 36, prohibits requests for admission that require a party to admit the truth of a legal conclusion.

Subject to and without waiving the above objections, Defendants deny the request as worded. However, V.T.C.A, Election Code § 31.012 sets forth the provisions for Voter Identification Education.
19. Admit that some county personnel have been trained to administer the issuance of EICs without DPS personnel present.

**RESPONSE:** Deny

20. Admit that TEX00462216 states that county officials were informed that they could set up mobile stations during regular business hours and could do so at other hours only if agreed to by the Secretary of State’s Office.

**RESPONSE:** Deny

21. Admit that the Governor’s Office reimbursed the Department of Public Safety for costs associated with providing equipment and training to counties to issue EICs.

**RESPONSE:** Deny

22. Admit there are 254 counties in the State of Texas.

**RESPONSE:** Admit

23. Admit the Excel spreadsheet represented by placeholder TEX00478555 represents contacts made during Fall 2013 with counties that did not have operating Driver’s License Offices about the county’s interest in receiving training to issue EICs or having DPS personnel issue EICs.

**RESPONSE:** Deny

**Dated:** June 19, 2014
CERTIFICATE OF SERVICE

I hereby certify that on June 19, 2014, a true and correct copy of the foregoing document was served via electronic mail to all counsel of record.

/s/ John B. Scott  
JOHN B. SCOTT
IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

MARC VEASEY, JANE HAMILTON, )
SERGIO DELEON, FLOYD J. CARRIER, )
ANNA BURNS, MICHAEL MONTEZ, )
PENNY POPE, OSCAR ORTIZ, KOBY )
OZIAS, JOHN MELLOR-CRUMLEY, PEGGY )
HERMAN, EVELYN BRICKNER, GORDON )
BENJAMIN, KEN GANDY, LEAGUE OF )
UNITED LATIN AMERICAN CITIZENS )
(LULAC), AND DALLAS COUNTY, TEXAS,
Plaintiffs,
v.
RICK PERRY, Governor of Texas; and JOHN )
STEEN, Texas Secretary of State,
Defendants.

UNITED STATES OF AMERICA,
Plaintiffs,

TEXAS LEAGUE OF YOUNG VOTERS
EDUCATION FUND AND IMANI CLARK,
Plaintiff-Intervenors,

TEXAS ASSOCIATION OF HISPANIC
COUNTY JUDGES AND COUNTY
COMMISSIONERS, AND HIDALGO
COUNTY,
Plaintiff-Intervenors,
v.

STATE OF TEXAS, JOHN STEEN, in his )
official capacity as Texas Secretary of State;
and STEVE McCRAWD, in his official capacity )
as Director of the Texas Department of Public )
Safety,
Defendants.

CIVIL ACTION NO.
2:13-CV-193 (NGR)
[Lead case]

CIVIL ACTION NO.
2:13-CV-263 (NGR)
[Consolidated case]
TEXAS STATE CONFERENCE OF NAACP BRANCHES; and the MEXICAN AMERICAN LEGISLATIVE CAUCUS OF THE TEXAS HOUSE OF REPRESENTATIVES,

Plaintiffs,

v.

JOHN STEEN, in his official capacity as Secretary of State of Texas; and STEVE McCRAW, in his official capacity as Director of the Texas Department of Public Safety,

Defendants.

BELINDA ORTIZ, LENARD TAYLOR, EULALIO MENDEZ JR., LIONEL ESTRADA; ESTELA GARCIA ESPINOSA, LYDIA LARA, MARGARITO MARTINEZ LARA, MAXIMINA MARTINEZ LARA, AND LA UNION DEL PUEBLO ENTERO, INC.

Plaintiffs,

v.

STATE OF TEXAS, JOHN STEEN, in his official capacity as Texas Secretary of State; and STEVE McCRAW, in his official capacity as Director of the Texas Department of Public Safety,

Defendants.

CIVIL ACTION NO. 2:13-CV-291 (NGR) [Consolidated case]

CIVIL ACTION NO. 2:13-CV-348 (NGR) [Consolidated case]

DEFENDANTS’ OBJECTIONS AND RESPONSES TO VEASEY-LULAC PLAINTIFFS’ SECOND SET OF REQUESTS FOR ADMISSION, INCORRECTLY TITLED AS VEASEY-LULAC PLAINTIFF’S FIRST SET OF REQUESTS FOR ADMISSION

TO: All Plaintiffs and Plaintiff-Intervenors, by and through their attorneys of record.
Pursuant to Rule 36 of the Federal Rules of Civil Procedure, the State of Texas, Rick Perry, John Steen and Steve McCraw, serve these Objections and Responses to Veasey-LULAC Plaintiffs’ Second Set of Requests for Admission.

Respectfully submitted,

GREG ABBOTT
Attorney General of Texas

DANIEL T. HODGE
First Assistant Attorney General

JONATHAN F. MITCHELL
Solicitor General

J. REED CLAY, JR.
Special Assistant and Senior Counsel
to the Attorney General
Southern District of Texas No. 1160600

/s/ John B. Scott
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Deputy Attorney General for Civil Litigation
Southern District of Texas No. 10418
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555 N. Carancahua, Suite 1770
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Southern District of Texas No. 5689

COUNSEL FOR THE STATE OF TEXAS,
RICK PERRY, JOHN STEEN, and STEVE
MCCRAW
DEFENDANTS’ OBJECTIONS AND RESPONSES TO VEASEY-LULAC
PLAINTIFFS’ SECOND SET OF REQUESTS FOR ADMISSION,
INCORRECTLY TITLED AS VEASEY-LULAC PLAINTIFF’S FIRST SET
OF REQUESTS FOR ADMISSION

1. Admit that, in 2011, the legislature did not appropriate funds earmarked or
designated for the Department of Public Safety to use to issue election
identification certificates at driver’s license offices.

OBJECTION: The language “earmarked or designated” is undefined, vague,
ambiguous and confusing rendering this request difficult to fairly admit or deny.

Subject to and without waiving the above objections, the Defendants deny
this request.

2. Admit that, since January 1, 2012, the legislature has not appropriated funds
earmarked or designated for the Department of Public Safety to use to issue
election identification certificates at driver’s license offices.

OBJECTION: The language “earmarked or designated” is undefined, vague,
ambiguous and confusing rendering this request difficult to fairly admit or deny.

Subject to and without waiving the above objections, the Defendants deny
this request.

3. Admit that, in 2011, the Texas legislature has not appropriated funds that
were earmarked or designated for the DPS to deploy mobile EIC units to
issue election identification certificates.

OBJECTION: The language “earmarked or designated” is undefined, vague,
ambiguous and confusing rendering this request difficult to fairly admit or deny.

Subject to and without waiving the above objections, the Defendants deny
this request.

4. Admit that, since January 1, 2012, the Texas legislature has not
appropriated funds that were earmarked or designated for the DPS to deploy
mobile EIC units to issue election identification certificates.
OBJECTION: The language “earmarked or designated” is undefined, vague, ambiguous and confusing rendering this request difficult to fairly admit or deny.

Subject to and without waiving the above objections, the Defendants deny this request.

5. Admit that the Texas legislature has not appropriated funds to pay for (or reimburse counties for) the costs associated with enabling counties to be able to issue EICs.

RESPONSE: Deny

6. Admit that the State of Texas and its agencies have not allocated funds to pay for (or reimburse counties for) the costs associated with enabling counties to be able to issue EICs.

OBJECTION: The language “allocated funds” is undefined, vague, ambiguous and confusing rendering this request difficult to fairly admit or deny.

Subject to and without waiving the above objections, the Defendants deny this request.

7. Admit that the State of Texas and its agencies have not allocated funds to pay for (or reimburse counties for) the costs associated with counties issuing EICs.

OBJECTION: The language “allocated funds” is undefined, vague, ambiguous and confusing rendering this request difficult to fairly admit or deny.

Subject to and without waiving the above objections, the Defendants deny this request.

8. Admit that the Texas legislature has not appropriated funds to pay for (or reimburse counties for) the costs associated with counties issuing EICs.

RESPONSE: Deny

9. Admit that the Secretary of State’s office does not maintain a list of the number of provisional ballots cast in each county for each election.
OBJECTION: The language “maintain a list” is undefined, vague, ambiguous and confusing rendering this request difficult to fairly admit or deny.

Subject to and without waiving the above objections, the Defendants deny this request as it incorrectly implies that the Secretary of State has a duty with respect to the maintenance of provisional ballots. The Secretary of State is not the custodian of records for election records. The general custodians of election records are established by V. T. C. A., Election Code § 66.001. Section 65.058 of the Election Code governs the preservation of provisional voting records.

10. Admit that the Secretary of State’s office does not maintain a list of the names of people who cast provisional ballots in an election.

OBJECTION: The language “maintain a list” is undefined, vague, ambiguous and confusing rendering this request difficult to fairly admit or deny.

Subject to and without waiving the above objections, the Defendants deny this request as it incorrectly implies that the Secretary of State has a duty with respect to the maintenance of provisional ballots. The Secretary of State is not the custodian of records for election records. The general custodians of election records are established by V. T. C. A., Election Code § 66.001. Section 65.058 of the Election Code governs the preservation of provisional voting records.

11. Admit the Secretary of State’s office does not maintain a master list of EIC’s issued.

OBJECTION: The language “maintain a master list” is undefined, vague, ambiguous and confusing rendering this request difficult to fairly admit or deny.

Subject to and without waiving the above objections, the Defendants only admit that the Office of the Secretary of State is not the state entity that has been designated as custodian of records for documentation related to Election Identification Certificates.

12. Admit that the DPS educational campaign related to EICs, referenced in your responses to Interrogatory No. 13 from the First Set of Interrogatories, did not use any funds earmarked or designated for the purpose of DPS educating the public about EICs.

OBJECTION: The language “earmarked or designated” is undefined, vague, ambiguous and confusing rendering this request difficult to fairly admit or deny.
Subject to and without waiving the above objections, the Defendants deny this request.

13. Admit that the Defendants did not consider data about the race or ethnic compositions of census blocks, cities, counties, or other geographic areas in determining where to locate its EIC mobile units.

OBJECTION: The language “consider data” and “census blocks” is undefined, vague, ambiguous and confusing rendering this request difficult to fairly admit or deny.

Subject to and without waiving the above objections, the Defendants deny this request.

14. Admit that the Defendants did not utilize economic data for census blocks, cities, counties, or other geographic areas in determining where to locate EIC mobile units.

OBJECTION: The language “utilize economic data” and “census blocks” is undefined, vague, ambiguous and confusing rendering this request difficult to fairly admit or deny.

Subject to and without waiving the above objections, the Defendants deny this request.

15. Admit that the Defendants are not aware of any state agency providing funds to counties to issue EICs.

RESPONSE: Deny

16. Admit that the funds the Secretary of State’s Office has spent on voter education efforts related to SB 14 were all funds received by the State pursuant to the Help America Vote Act (HAVA).

RESPONSE: Deny

17. Admit the State of Texas authorized funding for the implementation of SB 14.

RESPONSE: Admit
18. Admit that the estimated two year net impact to general revenue related funds for the enrolled version of SB 14 was $2,000,000.00.

**RESPONSE:** Admit

19. Admit the cost of equipment for an EIC mobile unit is less than $7,000 per unit.

**RESPONSE:** Admit

20. Admit the total cost of the equipment for the 25 mobile EIC centers used by DPS employees was less than $50,000.00.

**RESPONSE:** Deny

21. Admit the impact to DPS employees was less than $50,000.00.

**OBJECTION:** The language “impact to DPS employees” is undefined, vague, ambiguous and confusing rendering this request difficult to fairly admit or deny. The Defendant can neither admit or deny this request as it is either incomplete or nonsensical.

22. Admit that the State of Texas spent less than $1,000,000.00 on the voter ID public educational campaign between June 25, 2013 and May 23, 2014.

**RESPONSE:** Deny

23. Admit that the Department of Public Safety received information that the Attorney General’s Office would reimburse DPS for costs associated with providing equipment to counties to issue EICs.

**RESPONSE:** Deny

24. Admit that the Department of Public Safety received information that the Attorney General’s Office would reimburse DPS for costs of equipment associated with the mobile EIC program run by DPS.
RESPONSE: Deny

25. Admit that the Department of Public Safety was reimbursed by the Attorney General’s Office for costs associated with providing equipment to counties to issue EICs.

RESPONSE: Deny

26. Admit that the Department of Public Safety was reimbursed by the Attorney General’s Office for costs of equipment associated with the mobile EIC program run by DPS.

RESPONSE: Deny

27. Admit that, according to TEX00506373, the Department of Public Safety received a quote from a vendor that each scanner for the mobile EIC program or county EIC program would cost $101.88, including shipping.

RESPONSE: Deny

Dated: June 26, 2014

CERTIFICATE OF SERVICE

I hereby certify that on June 26, 2014, a true and correct copy of the foregoing document was served via electronic mail to all counsel of record.

/s/ John B. Scott
JOHN B. SCOTT
Plaintiff Exhibit

PL1086

WITHDRAWN
Plaintiff Exhibit
PL1087
WITHDRAWN
San Antonio woman uses dead sister's identity to vote

By Associated Press
Thursday, October 7, 2010 - 4:20am

SAN ANTONIO (AP) - An 81-year-old San Antonio woman has been arrested on charges that she used her dead sister's identity to vote a second time in the 2008 general election.

An affidavit says Mary Ann Comparin's older sister committed suicide in 1963, but the woman who goes by several aliases allegedly used her photo with the name and driver's license information of her late sister, Norma Gerrish Collins.

Officials tell the San Antonio Express-News Comparin was arrested Monday and faces one count of illegal voting.

Department of Public Safety spokeswoman Tela Mange says the agency matched images on the two licenses last year.

The Texas Attorney General's Office issued a warrant last week. Comparin's attorney didn't immediately return phone messages from The Associated Press on Wednesday night.
Since taking office in 2001, Texas Attorney General Greg Abbott has called voter fraud an “epidemic,” and made cracking down on it a top priority. Now, as he runs for governor, he’s touting his ongoing battle to implement the state’s strict voter ID law, arguing that the measure is crucial to combat fraud.

But over the 13 years of Abbott’s tenure, his office can only cite two fraudulent votes that might have been stopped by the ID law.

To put that another way, such votes accounted for one out of every 18.7 million votes cast in Texas during that period – and that’s counting only the general elections for statewide races. Meanwhile, 796,000 Texans, by the state’s own numbers, lack an ID.

The glaring difference between rhetoric and reality in Abbott’s treatment of the issue underscores the comically weak case for voter ID measures, and highlights the lengths that their backers have gone to – still without success – to find evidence of large-scale fraud. It also raises questions about Abbott’s basic intellectual honesty as he works to persuade Texas voters to make him one of the most important Republican office-holders in the country.

The struggle over access to voting is already playing a major role in the governor’s race, where Abbott, a Republican, is favored over state Sen. Wendy Davis, a Democrat, this fall. On the
campaign trail, Abbott’s pledge to fight to the death over voter ID is among his top applause lines. Democrats fret that, if left to stand, the law could make it far harder for low-income and minority Texans to cast ballots. Meanwhile, a group of national Democratic operatives supporting Davis is working to register large numbers of new voters – while Republicans and their allies put obstacles in their path.

Texas’s voter ID law, passed in 2011, was blocked the following year under the Voting Rights Act (VRA) by a federal court, which found that it discriminated against minorities, who are more likely to lack ID. But hours after the Supreme Court weakened the VRA, Abbott announced that the law was back in effect. It’s now being challenged by the U.S. Justice Department under a different part of the VRA.

Abbott has been highlighting the threat of voter fraud for far longer. In 2006 – just as national Republicans were gearing up an effort to stoke fears about voter fraud – the attorney general announced a $1.5 million effort to root out and prosecute it. “In Texas, an epidemic of voter fraud is harming the electoral process,” Abbott wrote in an op-ed, warning that fraud was happening “on a large scale.”

As he runs for governor, Abbott is still hyping the threat of voter fraud – though he no longer calls it an epidemic. (Asked whether Abbott views voter fraud as an epidemic, a spokesman for the Abbott campaign did not respond.) Instead, here’s what Abbott tells crowds:

[U.S. Attorney General] Eric Holder is trying to stop Texas from enforcing our voter identification law. Let me tell you, I am just one of the many prosecutors across the state of Texas who have been cracking down on voter fraud. There is a massive investigation conducted by the federal government, headed up by the FBI, that is making arrest after arrest after arrest in south Texas because of vote-buying, bribing voters, and then taking voters to drug houses after they have cast their votes. That is completely intolerable in the state of Texas. But also, I myself have been involved in cases where dead people have cast votes, live people have voted twice, and foreign nationals have registered to vote illegally. Voter fraud is real, it must be stopped, and I will take my case all the way to the Supreme Court.

In other words: Fraud is a major threat to elections and voter ID is the way to stop it. But based on the evidence provided by Abbott’s own team, both notions are flatly false.

No one disputes that there’s been illegal voting in Texas lately. In the FBI investigation into vote-buying in south Texas that Abbott refers to, three women working for school board candidates in the Rio Grande Valley have been accused of paying voters in cash, drugs, beer and cigarettes.

Days after they were arrested, the school board president committed suicide, and the probe is continuing.

There’s just one problem with Abbott’s use of the case: The allegations involve absentee ballots,
not in-person voting. That means the voter ID law that Abbott is championing would have done nothing to stop the alleged scheme.

Indeed, election experts say absentee ballot fraud is the most common form of organized voter fraud, since, because of the secret ballot, there's no way to ensure that an in-person voter is voting for the candidate he promised to. That’s why voter ID laws are an ineffective tool for catching the small amount of fraud that exists.

Last week, msnbc asked the Abbott campaign for information to support the rest of Abbott's litany: dead people voting, live people voting twice, and non-citizen registering to vote. In response, Jerry Strickland, a spokesman for the attorney general's office, forwarded information on five elections cases prosecuted by Abbott’s office. All five, plus one more, were also cited by Abbott’s office when the voter ID law was first challenged by the Justice Department in 2012.

Two of those six cases might potentially have been stopped by a voter ID law – though even these two appear to have involved feckless individual actors, rather than the kind of coordinated and dangerous large-scale fraud conspiracies that Abbott aims to invoke.

Jack Crowder pleaded guilty to a misdemeanor and paid a $200 fine after being charged with using the voter registration card of his dead father to vote in the 2008 Democratic primary. And Lorenzo Almanza used the voter registration certificate of his brother—who at the time was in prison—to vote twice in a 2009 school district election. Almanza pleaded guilty to illegal voting and was sentenced to two years in jail. His mother, Reyna Almanza, was convicted of lying to a poll workers on his behalf.

But in the other four cases, voter ID would have had no impact.

In the one case cited in the voter ID trial but not mentioned by Strickland, Delores McMillan, a Dallas election worker, pleaded guilty to trying to vote using another voter’s registration information. No fraudulent vote was ever cast—McMillan was stopped by another poll worker—and a voter ID law would have done nothing to stop her.

In a second case, Melva Ponce was charged with using her mother’s mail-in ballot to vote in the 2004 general election. There was no in-person fraud, and voter ID would not have stoppe Ponce—as an investigator with Abbott’s office conceded when asked about it directly by a Justice Department lawyer during a deposition in the voter ID case.

In the third case cited, Debra Briseno was sentenced to five years in prison for knowingly registering non-citizens to vote. But even if those non-citizens ended up casting a ballot, a voter ID law wouldn't have stopped them, since, thanks to Briseno, they were already on the rolls. No non-citizens were charged in the case.

The final case shows perhaps most clearly just how starkly Abbott’s invocation of voter fraud as a
looming threat to elections conflicts with the far more mundane reality.

After a year-plus investigation by Abbott's office, Mary Comparin was charged with using her dead sister's name to obtain an additional driver's license, then using the fake license to vote twice in 2008 – again, a scheme that the ID law would not have stopped.

Comparin, 81 and in a wheelchair at the time, was arrested and jailed. But she never faced trial: She was found mentally incompetent, effectively ending the case.

If Abbott's camp can point to other cases that would have been stopped by the voter ID law, it's not talking about them. Asked twice for other examples, Strickland did not respond.

More Like This

Nathan Deal stumbles on Dream Act question
msnbc News Quiz: Florida primary
msnbc News Quiz: The GOP
Warren to raise money for women's group
Plaintiff Exhibit
PL1090

Video Deposition of
Sammie Louise Bates
(excerpt of portions of designated testimony)
Plaintiff Exhibit
PL1091

Video Deposition of
Ramona Bingham
(excerpt of portions of
designated testimony)
Plaintiff Exhibit
PL1092

Video Deposition of
Elizabeth Gholar
(excerpt of portions of
designated testimony)
Plaintiff Exhibit
PL1093

Video Deposition of
Phyllis Washington
(excerpt of portions of
designated testimony)
Plaintiff Exhibit
PL1094

Video Deposition of
Malvin Holmes
(excerpt of portions of
designated testimony)
Plaintiff Exhibit
PL1095

Video Deposition of Naomi Eagleton
(excerpt of portions of designated testimony)
Barreto and Sanchez Final Data
Plaintiff Exhibit
PL1097

Barreto and Sanchez Survey Data
Barry C. Burden

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Academic Positions

Professor of Political Science, University of Wisconsin-Madison (2006-present)
   Associate Chair/Director of Graduate Studies (2007-2012)
Associate Professor of Government, Harvard University (2003-2006)
Assistant Professor of Government, Harvard University (1999-2003)
Assistant Professor of Political Science, Louisiana State University (1998-1999)

Education

Ph.D.  The Ohio State University (1998)
B.A.  Wittenberg University (1993)

Authored or Co-Authored Books


**Edited Books**


**Refereed Journal Articles**


Book Chapters


Book Reviews


Reports


**Other Publications**


**Honors and Awards**

Robert H. Durr Award – *given by the Midwest Political Science Association for the best paper applying quantitative methods to a substantive problem in political science* – “Election Laws and Partisan Gains: The Effects of Early Voting and Same Day Registration on the Parties’ Vote Shares,” with David Canon, Kenneth Mayer, and Donald Moynihan (2014)

H. I. Romnes Faculty Fellow, UW Graduate School (2010-2015)

Licking Valley Schools “Wall of Pride” Award (2009) – *given annually to alumni who distinguished themselves professionally or made notable contributions to society*

Hamel Family Faculty Fellow, UW College of Letters and Science (2008-2013)
University Residence Hall Favorite Instructor Award (2007)
Nominated for Harvard University Everett Mendelsohn Excellence in Graduate Mentoring Award (2006)
Emerging Scholar Award (2005) – given by the Political Organizations and Parties section of APSA for significant research by a scholar receiving her or his doctorate within the past seven years
Wittenberg University Outstanding Young Alumnus Award (2002) – given to a graduate of the last decade to recognize professional achievement
Nominated for Harvard University Joseph R. Levenson Memorial Teaching Prize (2000)
ΑΛΔ Award for superior instruction of freshman students (1999)
OSU Presidential Fellow (1998)
Francis R. Aumann Award for best OSU graduate student conference paper (1996 & 1997)
Ohio Board of Regents Fellow (1993-1995)
ΦΒΚ (1993)
Wittenberg University Student Leader of the Year (1992-1993)
Jeffrey Y. Mao Alumni Award in Political Science (1992)

Grants

UW Graduate School Research Committee, “Political Participation among Older Americans” (2014-2015, co-PI with Moynihan)
Center for Demography of Health and Aging, “Political Participation of Older Americans: The Role of Social and Genetic Factors” (co-PI with Jason M. Fletcher and Donald P. Moynihan, 2013-2014)
Wisconsin Government Accountability Board, $43,234 for “Analysis of Polling Place Incident Logs” (head PI with Canon, Mayer, and Moynihan, 2011-2012)
UW Graduate School Research Committee, “The Consequences of Electing Election Officials” (2009-2010)
Pew Center on the States, Making Voting Work: $49,400 for “Early Voting and Same Day Registration in Wisconsin and Beyond” (head PI with Canon, Mayer, and Moynihan,
2008-2009)
U.S. Election Assistance Commission, Election Data Collection Grant Program: responsible for
$212,442 of $2,000,000 grant to the Wisconsin Government Accountability Board (head
PI with Canon, Mayer, and Moynihan, 2008-2010)

UW Graduate School Research Committee: “The Puzzling Geography of Federal Spending,”
(2007-2008)

UW Graduate School Research Committee: “The Political Economy of the Japanese Gender
Gap” (2006-2007)

CAPS faculty research conference: $36,500 for “Democracy, Divided Government, and Split-
Ticket Voting” (2006)


Reischauer Institute of Japanese Studies: “Accountability, Economics, and Party Politics in
Japan” (2004-2006)

(with Casey A. Klofstad, 2004)

Harvard Faculty of Arts & Sciences Course Innovation Funds: “The Practice of Political
Science” (2003)

Dirksen Congressional Center Congressional Research Award: “The Discharge Rule and

Reischauer Institute of Japanese Studies Curriculum Enrichment Grant: “Electoral Politics in
America and Japan” (2002)

CBRSS research program grant: “Affect and Cognition in Party Identification” (2001)


National Science Foundation Doctoral Dissertation Improvement Grant: “Candidates’ Positions
in Congressional Elections” (1997)

Teaching and Advising

Undergraduate courses:
- Introduction to American Politics
- Elections and Voting Behavior
- Political Behavior
- American Public Opinion
- Election Reform in America
- The Politics of Congress/The Legislative Process
- Techniques of Political Analysis
- Electoral Politics in America and Japan
- The Practice of Political Science Research
Graduate courses:
   American Politics Field Seminar
   Mass Political Behavior
   Congress and Legislative Politics
   American Electoral Politics
   Readings on Advanced Statistical Methods
   Quantitative Research Design/Empirical Methods of Political Inquiry
   American Political Institutions
   Readings on Interest Group Politics
   Research Workshop in American Politics
   Political Science as a Discipline and Profession

Harvard Ph.D. advising (year and placement):
   Benjamin Deufel (2006 Greenberg Quinlan Rosner Research)
   Tammy M. Frisby (2006 Stanford University-Lane Center)
   Michael Kang (2009 Emory University-School of Law)
   Andrew Karch (2003 University of Texas & University of Minnesota)
   Casey A. Klofstad (2005 University of Miami)
   Robert Van Houweling (2003 University of Michigan & UC-Berkeley)
      *Carl Albert Dissertation Award for best dissertation in legislative studies*

Wisconsin Ph.D. advising (year and placement):
   Amy Bree Becker, Journalism & Mass Communication (2010 Towson University & Loyola University Maryland)
   Deven Carlson (2012 University of Oklahoma)
   Amnon Cavari (2011 Interdisciplinary Center–IDC Israel)
      *George C. Edwards III Dissertation Award for best dissertation in presidency research*
   Meghan Condon (2012 Loyola University Chicago)
      *APSA section on Experimental Research best dissertation award*
   Jack Edelson (ABD)
   William Egar (ABD)
   Erika Franklin Fowler (2006 RWJ Scholar in Health Policy & Wesleyan University)
   Hannah Goble (2009 Texas Christian University)
   Matthew Holleque, *chair* (2012 Obama for America)
   Bradley Jones, *chair* (ABD)
   Dimitri Kelly, *chair* (2013 Linfield College)
   Yujin Kim, *chair* (ABD)
   Paul Lachelier, Sociology (2007 Stetson University)
   Ruoxi Li (ABD)
   Jeremy Menchik (2011 Stanford Shorenstein Center post-doc & Boston University)
   Daniel Metcalf
   Jacob Neiheisel, *chair* (2013 Denison University & University of Buffalo)
   Joel Rivlin (ABD MSHC Partners & Pivot)
   Rajen Subramanian (2008 Abt Associates)
   Benjamin Toff (ABD)
Amber Wichowsky, \textit{chair} (2010 Yale CSAP Fellowship & Marquette University)
\textit{Carl Albert Dissertation Award for best dissertation in legislative studies}

\textbf{Reviewing Activities}

Journal manuscript reviews:

Book manuscript reviews:

Tenure and promotion reviews:
\textit{Dartmouth College, Florida State University, Fordham University, Louisiana State University, Princeton University, Rutgers University, Temple University, Texas Tech University, Tulane University, University of British Columbia, University of California-Berkeley, University of California-Riverside (twice), University of Chicago (public policy), University of Colorado, University of Houston, University of Massachusetts-Dartmouth, University of Maryland (twice), University of Missouri-Columbia, University of Missouri-St. Louis, University of North Carolina at Charlotte, University of Notre Dame, University of Pennsylvania, University of Texas-Dallas, Washington State University, and Washington University in St. Louis}

External review committee, Union College Department of Political Science (\textit{chair}, 2010)

Other reviews:
\textit{Canada Research Chair College of Reviewers, Radcliffe Institute Fellows, National Science Foundation, Robert Wood Johnson Scholars in Health Policy, Time-sharing Experiments in the Social Sciences (TESS)}
Professional and University Service

Journal editorial boards:
- *Electoral Studies* editorial board (2011-present)
- *Political Research Quarterly* (2014-present)
- *Legislative Studies Quarterly* editorial board (2011-2013)

Other boards and councils:
- Election Performance Index Advisory Board, Pew Center on the States (2010-2014)
- Legislative Studies section council (2009-2011)
- Political Organizations and Parties section council (2005-2007)
- Ad Hoc Committee on Member Communications (2013)
- Project Vote Smart Advisory Board (2007-)

Conference program organizer:
- Political Organizations and Parties, APSA annual meeting (2006)
- Political Methodology, SPSA annual meeting (2001)

Award committees:
- Political Organizations and Parties/Party Politics award committee for the best paper presented at the 2006 APSA annual meeting (*chair*, 2007)
- Political Organizations and Parties Emerging Scholar Award committee (*chair*, 2013)

Campus presentations:
- Dartmouth College, Northwestern University, Stanford University, SUNY-Stony Brook, University of Houston, University of Minnesota, University of Missouri-Columbia, University of Notre Dame, University of Rochester, University of Texas at Austin, Utah State University (twice), Wittenberg University, & Yale University (twice)

Public and community presentations:
- Boston Museum of Science, Brookings Institution, Civitas, National Legislative Program Evaluation Society, Newton Center for Lifetime Learning, Reach Out Wisconsin, Senior Summer School, UW-Extension College Days, Vantage Point, Wisconsin Academy of Sciences, Arts, and Letters, Wisconsin Department of Revenue, and alumni events in Wisconsin and New York City

Affiliations:
- Election Administration Project (*co-founder*, 2008-present)
- Wisconsin Advertising Project team (2008-2010)
- La Follette School of Public Affairs, Faculty Associate (2007-present)
- Center for Demography of Health and Aging (2013-present)
- Political Behavior Research Group (2006-present)
- Institute for Quantitative Social Science, Faculty Associate (1999-2006)
Political Psychology and Behavior Workshop (*co-founder*, 2000-2006)
Center for American Political Studies, Executive Committee (2001-2006) & Steering Committee (2003-2004)
Program on US-Japan Relations, Faculty Affiliate (2004-2006)
Weatherhead Center for International Affairs, Faculty Associate (2005-2006)
Summer Institute in Political Psychology (1995 & 1997)

Harvard committee service:
- Graduate Admissions (1999-2000)
- Teaching Fellow Coordinator (2003-2004)
- American Politics Field Coordinator (2005-2006)
- Truman Scholarship Nomination (2000-2001)
- Political Communication Faculty Search, Kennedy School of Government (2004-2005)

Wisconsin committee service:
- Faculty Senate (2006-2007)
- Associate Chair/Director of Graduate Studies (2007-2012)
  - Graduate Admissions and Fellowships, *chair*
  - Graduate Program Committee, *chair*
  - Teaching Assistant Evaluation Committee, *chair*
- L&S Teaching Fellow Anniversary Symposium Planning Committee (2009-2010)
- L&S C-GRS Faculty Executive Committee (2009-2010)
- Graduate School Social Studies Fellowships Committee (2010-2013)
- Social Studies Divisional Executive Committee (2013-2016)
- Faculty Recruitment Committee (2013-2014)
  - American Politics Search Committee, *chair*
- Preliminary Examination Appeals Committee (2013-2014)

Washington Times, Wisconsin Law Journal, Yomiuri Shimbun, Greater Boston on WGBH, NECN, Nitebeat with Barry Nolan, Odyssey on Chicago Public Radio, and many local television, radio, and newspaper outlets

Featured in An Unreasonable Man, an independent documentary film about the life and career of Ralph Nader (2006)

Consulting

Research consultant, via Research Triangle International Institute and the Pew Charitable Trusts, for evaluation of the Electronic Registration Information Center (2012-2014)


Academic researcher, Presidential Commission on Election Administration, established by presidential Executive Order 13639 (2013)
CURRICULUM VITA
GERALD (JERRY) R. WEBSTER

Present Address: 3221 Reynolds Street
Laramie, Wyoming 82072
Home Phone: (307) 745-8633

Business Address: Geography, Box 3371
1000 E. University Ave.
University of Wyoming
Laramie, Wyoming 82071-3371
Department Phone: (307) 766-3311
Fax: (307) 766-3294
Email: gwebste1@uwyo.edu

Personal Data: Born June 2, 1953 in Bremerton, Washington;
Graduated High School from Mannheim American High School,
Mannheim, West Germany, 1971.

EDUCATION

  Thesis Title: "The Economic Impact of Canadian Tourism in Whatcom County,
  Washington: An Examination of Selected Factors Influencing Canadian Cross-Border
  Activity."
  Advisor: Debnath Mookherjee.
  Dissertation Title: "The Spatial Reorganization of the Local State: The Case of County
  Boundaries in Kentucky."
  Advisor: Stanley D. Brunn.

POSITIONS HELD

Adjunct Professor, Global and Area Studies Program, University of Wyoming, 8/10 - present.

Professor and Chair, Department of Geography, University of Wyoming, 8/07 - present.

Chair, Department of Geography, University of Alabama, 1/01 - 8/07.

Professor, Department of Geography, University of Alabama, 8/97 - 8/07.
Associate Professor, Department of Geography, University of Alabama, 8/92 - 8/97.

Assistant Professor, Department of Geography, University of Alabama, 8/89 - 8/92.

Assistant Professor, Department of Geography and Recreation, University of Wyoming, 8/85 - 7/89.

Visiting Assistant Professor (leave of absence replacement), Department of Geography, University of Miami, Coral Gables, Florida, 8/84 - 5/85.

Visiting Instructor (sabbatical replacement), Department of Geography, University of Illinois, Urbana, Illinois, 1/84 - 5/84.

Instructor, Department of Geography, University of Kentucky, Lexington, Kentucky, 6/82 - 8/82; 6/83 - 8/83; and 6/84 - 8/84.

Teaching Assistant (full teaching responsibilities), Department of Geography, University of Kentucky, Lexington, Kentucky, 1/81 - 5/81; 8/82 - 5/83; and 8/83 - 12/83.

Instructor, European Division, University of Maryland, Bremerhaven, West Germany, 6/81 - 9/81.

Research Assistant, Department of Geography and Regional Planning, Western Washington University, Bellingham, Washington, 9/79 - 6/80.

Teaching Assistant, Department of Geography and Regional Planning, Western Washington University, Bellingham, Washington, 8/78 - 6/79.

**PRIMARY TEACHING INTERESTS**

<table>
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<th>Lower Division</th>
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<tr>
<td>Human Geography</td>
<td>Political Geography (International, U.S.)</td>
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<td>World Regional Geography</td>
<td>Urban Geography</td>
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<tr>
<td>Planning</td>
<td>Research Methods and Traditions</td>
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<td>Middle America</td>
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**COURSES TAUGHT (no. of times as of Fall 2014)**

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<tr>
<td>Introduction to Geography</td>
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<tr>
<td>Introduction to Physical Geography</td>
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<tr>
<td>Introduction to Climatology</td>
<td>2</td>
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<tr>
<td>Geography of Middle America</td>
<td>4</td>
</tr>
<tr>
<td>Geography of Latin America</td>
<td>2</td>
</tr>
<tr>
<td>Introduction to Land Use Planning</td>
<td>8</td>
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</table>
Introduction to Human Geography (12)  
Research Methods and Traditions (21)  
Introduction to World Regional Geography (46)  
Political Geography (13)  
Social and Cultural Geography (1)  
Political Geography of the U.S. (2)  
Urban Geography (7)  
Critiquing the Literature (2)  
Participation in Computer Based Honors Program, University of Alabama (4)

Directed Independent Studies Courses: Geography of Europe, Geography of Latin America, Geography of the Soviet Union, Geography of Religion in the U.S., Social and Cultural Geography, Geography of the Rocky Mountain Region, Geography of UN Voting, Mexico in the International System, Section and Party in India, Nation and State in Africa, NGOs and the International System, Pre-Columbian Settlement Planning and Design in Mexico, Geography of Crime, Geopolitics, Geography of Taxation, Geography of BBQ, Use of Geographic Place Names in Presidential Debates.

THESES AND SELECTED NON-THESIS PAPERS DIRECTED


Valerie Stout (1996), "Electoral Geography of Legislative Support for the 'Takings Law'," Non-thesis research paper.


**PRIMARY RESEARCH INTERESTS**

Redistricting
Spatial Organization of Government
Southern Politics
Electoral Geography
Electoral Regionalism and Change in the United States
Political Iconography
Secessionist Movements
Nationalism
Sanctification of Indian Massacre Sites

RESEARCH PRESENTATIONS


“Here or There: Looking at the Usage of Foreign and Domestic Place Names in Presidential Debates, 1976-2012,” with Matt Balentine and Justin Frazier, Great Plains-Rocky Mountain Division of the Association of American Geographers, Omaha, NE, October 2013.


“Pre-Election Perspectives on the 2012 Elections,” Keynote Address, Mid-Atlantic Division, Salisbury, MD, November, 2012.


“Custer May Have Died for Our Sins But He Didn’t Go Away,” Department of Geography, South Dakota State University, March, 2011.


“Memorializing Controversy: Custer Place Names on the Western Landscape,” Great Plains-Rocky Mountain Division of the Association of American Geographers, Lawrence, KS, October, 2010.


“Custer May Have Died For Our Sins But He Didn’t Go Away,” Colloquium, Department of Geography, University of Alabama, March 2010.

“Custer May Have Died For Our Sins But He Didn’t Go Away,” Southeastern Division of the Association of American Geographers, Knoxville, TN, November 2009.


“Race, Religion and the Confederate Battle Flag in the American South,” with Jonathan Leib,
Race, Ethnicity and Place Conference, Miami, FL, November 2008.


“‘Race,’ the Creative Class and Political Geographies of Same Sex Marriage in Georgia,” with Thomas Chapman and Jonathan Leib, Applied Geography Conference, Tampa, FL, October, 2006.


“Quantitatively Delineating the Black Belt Geographic Region,” with Jerrod Bowman, Symposium of the History and Culture of the Black Belt, Livingston, AL, April 2005.


"Rethinking the Role of Compactness in Redistricting," Southeastern Division of the Association

"Political Geography, the Internet and Hate Groups: What Our Students Know and We Don't," National Council for Geographic Education, Chicago, IL, August, 2000.


"The Confederate Battle Flag Debate in Alabama," Southeastern Division of the Association of


"Section versus Sector: Regional and Economic Influences on Congressional Support for Free Trade," with Chris Merrett, Conference on Frontiers of Research in Political Geography, San Marcos, TX, April, 1997.


"Ideological Polarization in Congress in the 1990s: Race, Region and Redistricting," Association of American Geographers, Charlotte, NC, April, 1996.


"Redistricting and Ideological Shifts in the U.S. House of Representatives, 1992-1993," Southeastern Division of the Association of American Geographers, Virginia Beach, VA,


"The United States Senate, the United Daughters of the Confederacy and the Confederate Flag," with Roberta H. Webster, Alabama Academy of Science, Troy, AL, March, 1994.


"Geography of the Presidential Debates," with Cynthia Sutherland, Alabama Academy of Science, Huntsville, AL, March, 1993.


"Pre-Hurricane Gilbert Jamaican Landscapes," Geography Awareness Week Presentation, Sponsored by the University of Wyoming Geography and Recreation Club and GTU Chapter, Laramie, WY, November, 1988.


GUEST LECTURES/INVITED COLLOQUIA


“Voting in Alabama: Race, Religion, Place and the Culture Wars,” WyGISC Colloquium Series, 4/09.


“Geography, Regions and the “Americas,” Wyoming Geographic Alliance Summer Workshop, 6/08.

“Sports, Community, Nationalism and the International State System,” GTU Initiation Banquet Address, University of Wyoming Chapter, 4/08.

“Contesting the Meaning and History of the Confederate Flag(s),” Department of History Research Colloquium, Collective Memory Session, University of Wyoming, 4/08.

“Women, the Voting Franchise and Electoral Politics,” Women’s Studies 3500, Gender and Society, University of Wyoming, 3/08.

“Making the Transition from Undergraduate to Graduate Studies,” Geography Program, Western Washington University, 9/07.

“Berlin, the Wall and German Reunification,” Geography of Europe class, University of Alabama, 4/06.

“Cuba, Tourism, Sugar and U.S. Foreign Policy, PLAHS Seminar on “Cuba and Mexico,” University of Alabama, 4/05.

“Geography, Diplomacy, Power and the War in Iraq,” Department of Geology and Geography, Auburn University, 11/03.

“Geography, Power and Redistricting,” Department of Geology and Geography, Georgia Southern University, 10/02.

“Cuba and the Redevelopment of its Tourist Economy,” Guest Lecture for “Geography and Tourism” class, University of Alabama, 10/02.

“Where’s the South?,“ Alabama Geographic Alliance Teachers’ Workshop, 7/01.
“Geography and Political Structure,” Alabama Geographic Alliance Teachers’ Workshop, 7/01.

“Geography and Redistricting,” Alabama Geographic Alliance Teachers’ Workshop, 7/01.

“Directions and Maps,” Mrs. Spencer’s cluster (2nd and 3rd Grade), Capitol School, 5/01.

"Cuba, American Foreign Policy and the Redevelopment of the Cuban Tourist Industry," Guest Lecture for Geography and Tourism class, University of Alabama, 3/01.


"Political Geography of the South," Guest Lecture for the Historical Geography of the South class, University of Alabama, 12/00.

"Results of the 2000 Elections," Guest Lecture for the Geography of North America class, University of Alabama, 11/00.

"Geographical Perspectives on the 2000 Elections," Colloquium, Georgia State University, 10/00.

"Where's the South?," Content Lecture for Alabama Geographic Alliance Teachers' Workshop, University of Alabama, 7/00.

"The Geographic Subdivision of Political Space," Content Lecture for Alabama Geographic Alliance Teachers' Workshop, University of Alabama, 7/00.

"Redistricting, Reapportionment and Minority Rights in the South," Content Lecture for Alabama Geographic Alliance Teachers' Workshop, University of Alabama, 7/00.


"Where's the South?," K-12 Teachers' Workshop, Alabama Geographic Alliance, 7/99.


"Political Geography," Mississippi Geographic Alliance Teachers' Workshop, Starkville, Mississippi, 6/98.


"The Five Themes and the Alabama Black Belt." Summer Teachers Workshop, Dept. of Geography, University of Alabama, 6/95.


"Kuwait after the War," lectures for the University of Alabama International Student Association 12/94, Mortar Board Conference on Social Studies Issues for Alabama Teachers 2/95, University of Alabama World Regional Class, 3/98.

"Redistricting in the 1990s," Mortar Board Conference on Social Studies Issues for Alabama Teachers, 2/95.


PAPERS, CHAPTERS AND BOOKS CURRENTLY IN PROGRESS OR REVIEW


“The Sanctification of the Washita Massacre Site,” for submission to the Journal of Cultural Geography.

“Custer May Have Died for Our Sins But He Didn’t Go Away,” for submission to Focus.
PUBLICATIONS IN REFEREED JOURNALS


Chapman, Thomas; Leib, Jonathan, and Webster, Gerald R. (2007), “Race, the Creative Class, and Political Geographies of Same Sex Marriage in Georgia,” Southeastern Geographer, 47: 27-54.


EDITING, BOOKS AND BOOK CHAPTERS


Pomeroy, George and Webster, Gerald R., editors (2008), Global Perspectives on Urbanization, New York: University Press of America.


Guest Editor, Southeastern Geographer, special issue on the “Political Geography of the South,” Vo. 47(1), May 2007.


Editor, Political Geography Specialty Group Newsletter, 1994-95.

**PUBLICATIONS IN NON-REFEREED OUTLETS**


Webster, Gerald R., and Webster, Roberta H. (1993), Correspondence Study Course, GY 103, Introduction to Geography, College of Continuing Education, University of Alabama, 46 pp.


Webster, Gerald R. (1989), Correspondence Study Course Student Manual for Geography 303, Introduction to World Regional Geography, Correspondence Study Department, University of Wyoming, pp. 125.


BOOK REVIEWS


**AWARDS**

“Political Geography Best Manuscript Reviewer for 2013,” Elsevier Publishers and *Political Geography*.


Selected to provide the 2012 Political Geography Plenary Lecture, Association of American Geographers, New York, NY, February 2012.

Outstanding Lifetime Achievement Award, Southeastern Division of the Association of American Geographers, Savannah, GA, November 2011.


Outstanding Service Award, Southeastern Division of the Association of American Geographers, Charleston, SC, November 2007.


Received a Joseph J. Malone Fellowship in Arab and Islamic Studies by the National Council on US-Arab Relations. Supported a three week study program in Kuwait and Syria, March 15-April 3, 1994.

Awarded Research Semester (no teaching obligations), College of Arts and Sciences, University of Wyoming, Fall semester, 1987.

Finalist in Warren Nystrom Award Competition, annual meeting of the Association of American Geographers, Detroit, Michigan, April, 1985.

Award for best paper written and presented by a Ph.D. student, Student Honors Competition, annual meeting of the Southeastern Division of the Association of American Geographers, Memphis, Tennessee, November, 1982.

CONSULTING, CONTRACTS AND GRANTS


Consultant/Expert Witness, Joint Committee on Redistricting, Mississippi State Legislature, 2011.


National Geographic Education Foundation Grant, Wyoming Geographic Alliances, Co-PI, $49,000, 2011-12.

National Geographic Education Foundation Grant, Wyoming Geographic Alliance, Co-PI, $52,000, 2010-11.

National Geographic Education Foundation Grant, Wyoming Geographic Alliance, Co-PI, $53,000, 2009-10.

National Geographic Education Foundation Grant, Wyoming Geographic Alliance, Co-PI, $55,152, 2008-09.


Consultant to Mississippi State Legislature for congressional redistricting, 2001-02.

Consultant to the City of Montgomery, Alabama for redrawing of city’s council districts, 2001.


Recipient of General Research Grant, Research Grants Committee, University of Alabama. Project on The Spatial Distribution and Impacts of New Deal Aid. Summer 1991. $6,000.


Recipient of Basic Research Grant, College of Arts and Sciences, University of Wyoming. For "Wyoming in Maps Project." 1988-89. $2,000.

Recipient of Faculty Growth Award, UW Alumni Association, University of Wyoming. For travel to annual meeting of Association of American Geographers, Baltimore, Maryland, 1989. $362.14.


Recipient of Basic Research Grant, College of Arts and Sciences, University of Wyoming. Research Project on Socioeconomic Well-Being and Intergovernmental Revenue Transfers to Local Governments in Wyoming and the United States. 1986-87. $2,000.


Selected participant in first annual Colloquium on Excellence in Teaching and Advising, University of Wyoming, April 19-23, 1986, $900 Stipend.
Grant from Dean, College of Arts and Sciences, University of Wyoming. Research Project on Republican Party Strength and Presidential Voting in the Interior West. 1985-86. $800.

New Faculty Starter Grant, Department of Geography, University of Miami. Research Project on the Growth of Republican Voting in the Miami SMSA. 1984-85. $100.

Exxon Honorarium to attend Guided Design Workshop, annual meeting of the National Council for Geographic Education, Pittsburgh, Pennsylvania, 1981.

PROFESSIONAL ORGANIZATIONS

Association of American Geographers
Political Geography Specialty Group, AAG
Southeastern Division, AAG
Great Plains-Rocky Mountain Division, AAG

EDITORIAL BOARDS


Editorial Board, Political Geography, 2001 - present.


SERVICE ACTIVITIES

Executive Committee, Wyoming Geographic Alliance, 2009-present


Panelist, 2011 Wyoming Social Sciences Institute, Cody, WY, March.

Member, Head’s Council, 2010-11.

Member, RFP Review Committee, 2009-10.
Member, Institute for Global Affairs Steering Committee, 2009-present.

Member, AAG Constitution and Bylaws Committee, July 1, 2007-June 30, 2010.


Member of Program Committee, Southeastern Division of the Association of American Geographers, 2004 annual meeting, Biloxi, Mississippi, 2004.

Member of Population Subcommittee, Tuscaloosa 2020 (Strategic Planning Process), 2003-04.

Member of Program Review Committee for Department of Criminal Justice, College of Arts and Sciences, University of Alabama, 2003-04.

Member of Arts and Sciences Space Committee, 2003-04.

Elected to Faculty Senate, University of Alabama; Faculty Senate Steering Committee; co-chair of the Planning and Operations Committee; Faculty Senate Liaison to Health and Safety Committee, 1998-99; Faculty Senate Liaison to Master Plan Committee, 1999-00; Co-Chair of the Communications Committee, Legislative Agenda Committee, 1999-00.

Member, Local Arrangements Committee for Golden Anniversary SEDAAG Annual Meeting, Birmingham, Alabama, November, 1997.

Elected Secretary of the Southeastern Division of the Association of American Geographers (Editor of the SEDAAG Newsletter), 1996-98.

Elected Chair of the Political Geography Specialty Group, Association of American Geographers, 1995-97.

Elected Chair of the Nominations Committee, Southeastern Division of the Association of American Geographers, 1995.

Member of the University of Alabama Latin American Studies Steering Committee, University of Alabama, 1994-95.

Chair, Committee for Rewriting Departmental Tenure and Promotion Guidelines, Department of Geography, University of Alabama, Fall 1994.
Elected Secretary/Treasurer of the Political Geography Specialty Group, Association of American Geographers, 1994-95.

Member of the Arts and Sciences Tenure and Promotion Committee, University of Alabama, 1993-94, 1994-95.

Member of University Appeals Committee, University of Alabama, 1993-94.

Alternate Member of Faculty Senate, University of Alabama, 1993-95.

Member of Program Review Committee for Department of Mineral Engineering, College of Engineering, University of Alabama, 1992-93.

Member of Interim Program Advisory Committee, University of Alabama, 1992-93.

Elected Member of Faculty Senate, University of Alabama, 1992-93.

Elected as State Representative (Alabama) to the Southeastern Division of the Association of American Geographers, 1992-94.

Member of Program Committee, 1993 AAG Annual Meeting in Atlanta, Georgia, 1992-93.

Member of Nominating Committee, Political Geography Specialty Group, 1991-93


Chair, Chair's Leadership Review Committee, Department of Geography, University of Alabama, Spring 1991.

Member, Program Committee, SEDAAG Annual Meeting in Columbia, South Carolina, Fall 1990.


Chair of the Region 2 Awards Committee, National Council for Geographic Education, 1990; member 1988-89.

Elected Member of the Board of Directors, Political Geography Specialty Group, Association of American Geographers, 1987-89.
REFEREE/REVIEW ACTIVITIES

Antipode, 2000, 2010 (2).
Geographies of Religions and Belief Systems, 2013, 2014.
Journal of Maps, 2010
2012 (4), 2013 (4), 2014 (3).
Territory, Politics, Governance, 2013.

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**MISCELLANEOUS SERVICE AT PROFESSIONAL MEETINGS**


8/1/14