declined that offer. Would you mind telling me why?

A. I declined it because they wanted to come like the next week or so. That was not timely enough for us to notify the constituents of Jefferson County.

Q. And when you say that -- when you testified that they notified you days before, was that days before the November 5th, 2013 election?

A. No, days before they wanted to set up the DPS mobile station.

Q. And did the Secretary of State's office offer in any way to assist in providing notice to county residents of the availability of the mobile EIC stations?

A. No. At that time they did not tell me of any assistance that they were going to give me on the notification.

Q. And when they were actually set up, the -- in February, did they provide you with any assistance in reaching out to the residents of Jefferson County regarding the availability of the mobile EIC stations?

A. When they set up in February, yes, they did. They did some radio announcements.

Q. But the Secretary of State's office did the radio announcements?

A. Yes, they did.
Q. And when were those radio announcements actually -- do you know how many radio announcements?
A. No, I don't know how many, but they were done like for at least a week.
Q. And do you know what time of day, when they actually occurred?
A. No, sir, I don't.
Q. Do you know what the substance of the radio announcement was?
A. The substance was just that they were going to have the mobile stations here for those requiring election identification cards in order to vote, if you didn't have the proper photo ID.
Q. And were those radio announcements by the Secretary of State, do you know if they were in both English and Spanish?
A. I don't remember the Spanish version.
Q. And I believe you were asked the question -- or strike that. Let me just ask you the question: Do you believe that a week's notice of -- was effective -- do you believe that the EIC stations in February were effective?
A. I'm not sure because I don't know what the turnout was. I know that we did the best that we could to get the messages out to the churches and to the
organizations that we had access to. And we had a couple of weeks in order to get that message out, so at least I felt like we had more time to get the messages out. Whether or not they were utilized, I'm not sure.

Q. Okay. And why are you not sure what the turnout is in Jefferson County regarding the mobile EIC station?

A. Because at that time, I was involved in doing the early voting for that election.

Q. And did the DPS offer any information regarding the mobile EIC stations?

A. No, they did not.

Q. Did you at any time request any information regarding the mobile EIC stations?

A. No, I did not.

Q. And I believe -- and I apologize if you've answered this question. Was there any county staff that were present during the operation of the EIC mobile station?

A. No, not -- only to the point of going to make sure that the buildings were open and accommodating for the DPS personnel they had out there.

Q. Did the Secretary of State's office or DPS offer to allow any county election officials to assist
during the operation of the mobile EIC stations?

A. They didn't offer, and I did not offer because I would not have had the staff available. We were in the middle of elections at the time.

Q. So when you say "they didn't offer," you're talking about DPS?

A. DPS, or Secretary of State.

Q. And if they had offered, you did not have staff available, is that what you're telling me?

A. No, I would not have had the staff available.

Q. Regarding DPS, the DPS offices, have you -- are you aware of any complaints by Jefferson County residents regarding their reluctance to go to DPS for any reason?

MR. KEISTER: Object to form.

A. I'm sorry, would you repeat that?

Q. (By Mr. Gear) Sure. That probably wasn't clear. Have you heard any complaints from county residents regarding the DPS offices?

MR. KEISTER: Object to form. Vague.

A. Well, yeah. They complain it's not accessible, it's far, and it's always too crowded.

Q. (By Mr. Gear) And when you say always too crowded, do you have an idea as to what the wait times in the DPS offices currently are?
A. Well, I can only go by what I'm told, and that's anywhere from 30 minutes to an hour, or longer.

Q. And that would be the average wait time, as you understand it, in the DPS offices in Jefferson County?

MR. KEISTER: Object to form.

A. Yes. And that's because of the wait time behind those getting, I guess, driver's licenses, or renewals, or whatever.

There is no -- as far as I know, there has been no provisions just to go in and get EIC cards, certificates.

Q. (By Mr. Gear) Do you have an understanding as to what the EIC election identification certificate process is at DPS?

A. No, I don't.

Q. Do you have an opinion as to whether or not the underlying documents that are necessary to present in order to receive an EIC are free?

MR. KEISTER: Object to form.

A. They are not free.

Q. (By Mr. Gear) And when you say they are not free, what is the basis of your opinion?

MR. KEISTER: Object to form.

A. Well, you have to have some type of a birth
certificate, or a marriage license, or some type of form
to prove who you are.

Q. (By Mr. Gear) And in Jefferson County, if
someone does not have an original or certified copy of
their birth certificate, I believe you testified that
the amount has been reduced, but it is -- the birth
certificate would not be free; correct?
A. That is correct.
Q. The reduced fee, would that be required to be
paid by the applicant for the birth certificate?
A. Yes, that's correct.
Q. And I believe you also testified that if an
individual enters into the office of vital statistics to
get a birth certificate, that they would not be
immediately informed of the reduced fee.
A. Not unless they would tell the clerk what the
purpose was -- what they are there for, what they need
it for. I mean, it's not information that's just
volunteered.
I mean, the clerk is not going to say,
"Do you need a birth certificate for an EIC card?"
Q. So the answer to that is "no"?
A. Yes.
Q. You testified briefly about the religious
exemption for photo IDs, and you mentioned that -- well,
How has the county advertised regarding the religious exemptions for photo IDs?

A. We have not advertised anything about exemptions, religious exemptions.

Q. Has the county advertised regarding disability exemptions?

A. No, we have not.

Q. Are you aware of whether the state has provided any -- any assistance in advertising that information -- that type of information regarding exemptions in Jefferson County?

A. I'm not aware of any.

Q. And as the election administrator, is it fair to say that if they had, you would be aware of that?

A. That's correct.

Q. You mentioned that the county was responsible for implementing its own training regarding S.B. 14. Am I correct on that?

A. Yes.

Q. Did you reach out to any other counties regarding the training and the implementation of S.B. 14?

A. No, I did not.

Q. Has any county resident expressed concerns
regarding a fear of going to DPS because they may be targeted in any fashion?

MR. KEISTER: Object to form. Vague.

Calls for speculation.

Q. (By Mr. Gear) Well, let me clarify that. I asked has any county resident -- are you aware of any county resident complaining to you or your staff regarding DPS because of fear of being targeted in any fashion by the DPS offices?

MR. KEISTER: Objection; form. Vague.

A. Well, I don't know about fear. I guess there was an initial dialogue whether or not if they apply for EIC, could they be arrested if they had warrants.

Q. (By Mr. Gear) When you say "initial dialogue," who was this dialogue with?

A. Just citizens of Jefferson County. I mean, that was the initial dialogue, any time they go to DPS, though.

Q. And what is your understanding of -- could you please explain the substance of that dialogue?

A. I mean, most people think that when they go to DPS, that DPS is going to run their name to see if they have any warrants.

I mean, I have known a lot of people that if they have warrants, they go straight from DPS to
jail. I guess if you do the crime, you do the time.

Q. What about underlying traffic tickets?

A. Those, too.

Q. Have there been any concerns regarding names of county residents being run who may have underlying traffic tickets, or outstanding tickets?

A. I guess there may have been some concerns as well.

Q. And what, if any, understanding do you have about the process at DPS regarding running for warrants for underlying tickets or traffic tickets?

A. Well, I don't know what their process is.

Q. So as you sit here today, your testimony is that you heard from county residents regarding concerns related to being arrested at DPS and having their names checked for tickets or traffic tickets, but you don't know what the process is at DPS currently?

A. That's true.

MR. KEISTER: Object to form. Mischaracterizes previous testimony. Plus, it's vague.

Q. (By Mr. Gear) And I didn't catch your answer to that.

A. That's true.

Q. And I'm almost done. I have maybe one or two more questions.
Regarding the mobile EIC stations, did the Secretary of State's office assist in any way to determine the appropriate locations for the mobile EIC stations?

A. No, they did not.

Q. Did they provide you with any data that may suggest where the highest no matches may be in Jefferson County?

A. No, they did not.

Q. And you have been the election administrator since 2004, did I understand that testimony correctly?

A. Yes, I've been county clerk since 2004.

Q. County clerk. And since 2004, are you aware of any allegations, investigations, or convictions of any person in voter fraud in Jefferson County?

A. No, I'm not aware of any.

Q. And that's true from 2004 to the present?

A. That's correct.

Q. And prior to 2004, are you aware of any allegations, investigations, or convictions of any person voter impersonation fraud?

A. I'm not aware of any.

Q. And one last question. I understood -- and I do not have the exhibits in front of me. But I understood that you provided some testimony regarding
military ID, and there's a question regarding military ID with no photo. Do you recall that testimony?

A. There was testimony concerning military ID that had a name only with no birth date or anything on it, no birth date or address.

Q. Okay. And so my question is: What, if any, type of training have you provided to your poll workers and election judges on how to deal with that specific issue?

MR. KEISTER: Objection; form.

A. Well, we have examples from the Secretary of State showing the different type of ID. I've never run across a military ID that didn't have a birth date or a picture on it, so that would be something new, if it didn't.

Q. (By Mr. Gear) And if you were to run across that situation, or one of your election judges, or poll workers, more appropriately, would that individual who is presenting a military ID with those factors -- how would they be allowed to vote?


A. If his military ID bear no what? No birth date?

Q. (By Mr. Gear) Birth date.
A. No address?

Q. I believe you had one other factor that you --

A. No address, only his name and his picture?

Q. That's correct.

A. Well, if it had a name and his picture on it, and I guess it looked like him, hopefully, he would have another form of ID. He would have to have a second form of ID. If not, he would probably vote a provisional ballot.

Q. So do I understand your testimony, if that person did not have a second form of ID, they would be required to vote a provisional ballot?

Mr. Keister: Objection; form. Vague. Mischaracterizes previous testimony and calls for speculation.

Counsel, I think you're confusing the example with the testimony that's been given. There hasn't been any military ID questions presented other than the exhibit with the hypotheticals.

Mr. Gear: And certainly, I don't want to confuse the situation. I certainly don't want to confuse the deponent.

Q. (By Mr. Gear) So the question before you is -- which I believe you've answered, is if an individual came in to a polling place with a military
ID, that -- under the situations you have testified to,
I believe you indicated your testimony -- in your
testimony, that they would be required to present a
second form of ID. Am I accurate on that?
MR. KEISTER: Objection; form.
Mischaracterizes previous testimony.
A. Right. I believe so. I would have to look
that one up. I would say I would have to go back to the
election code and look that one up, or to the photo ID
law and look that up.
Q. (By Mr. Gear) And at a polling place, would
that be left to the discretion of the poll worker or the
election judge?
MR. KEISTER: Objection; form, vague.
A. Well, probably the election judge and the poll
worker at that time, if they were confused, they will be
calling us, and we would be looking it up. Because
normally that's what they do.
If they are not sure, they're instructed
to call us. Which is myself, or Teresa, or the election
manager. And then, of course, before we give them an
answer, we would look it up.
We want to be within the intent of the
law. So I just can't answer it haphazardly without
seeing what applies in that case.
Q. And I apologize for any confusion I caused.
A. That's quite all right.
MR. GEAR: I have no further questions.
And I pass the witness.
MR. KEISTER: Anyone else on the telephone?
MS. SIMSON: I don't believe so. I think it's just Bruce.

EXAMINATION
BY MR. KEISTER:
Q. Ms. Guidry, with respect to that issue, the military IDs, have you seen any military IDs here today that you've looked at?
A. No, I have not.
Q. And the questioning that occurred earlier with respect to military IDs was questioning concerning the examples that was provided to you in Exhibit No. 1; correct?
A. Right.
Q. Now, with respect to what you would look for, or what you would train the poll workers to look for, with respect to a proper military ID, have you been provided examples by the Secretary of State as to what the various military IDs look like?
A. Yes.
Q. And how is that information provided to you, or how was that information provided to you?

A. We got it -- I mean, via examples on the Secretary of State's Web site.

Q. Okay. And does the Secretary of State also provide some type of training with respect to that?

A. Right, the training.

Q. And you pass that along to the -- to your poll workers, that information?

A. Yes, give examples.

Q. Okay. Now, you testified that the population of Jefferson County is approximately 252,000 people?

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