Q. Okay. That's not something you look at or use in your election responsibilities, or do you?
A. No, not really.
Q. Okay. Is that something you can find easily?
I see you have your computer.
A. If I can go on-line, but I don't think I have wifi in here.
Q. Okay. Well, I don't want to keep you there then. All right. What about, you testified there was approximately 140,000 registered voters in Jefferson County?
A. Right, uh-huh.
Q. Okay. Do you have any knowledge of what the racial breakdown of the -- of that number is, of the registered voters?
A. I think it's over 50 -- over 50-something -- over 50 percent minority, I know.
Q. Okay. And by minority, you're referring to African-American, Latinos?
A. Right.
Q. Do you have -- do you know how that 140,000 person number breaks down in terms of Republicans versus Democrats in Jefferson County?
A. I can tell you probably the majority here -- normally, Jefferson County is a Democratic -- Democrat
county.

Q. Okay.

A. But I can't tell you how it breaks down.

Q. Okay. Do you have an estimate of what you think it would be?

A. An estimate, if I had to estimate, I would say we're probably at least -- I don't know. 75, 80 percent Democrat.

Q. Okay. And you, yourself, are a Democrat; correct?

A. Yes, sir, I am.

Q. Okay. And you said you first ran for the county clerk's office in 2004?

A. That's correct.

Q. And you took over, or ran for another unexpired term, or for -- is that the correct term?

A. Right, unexpired term, right.

Q. And who did you replace that year?

A. I replaced -- there was an interim county clerk, but Sandy Walker had retired --

Q. Okay.

A. -- the previous year.

Q. Okay. And what is your term of office, normal term of office?

A. Four years.
Q. Okay. So you ran in 2004. So you ran again in 2006?
A. That's correct.
Q. And obviously, were re-elected?
A. Right.
Q. And then ran again in 2010?
A. Right.
Q. And obviously, were elected. Are you up this year?
A. Yes, I am.
Q. Okay. So you're currently running?
A. Right.
Q. All right. I take it -- you mentioned earlier that you, yourself, have a driver's license?
A. Yes, sir, I do.
Q. Okay. Do you have any of the other forms of ID in addition to your driver's license that S.B. 14 calls for?
A. Yes, sir, I have a passport.
Q. Okay.
A. That's it.
Q. Okay. So either one of those are acceptable for voting, correct?
A. Right.
Q. If you -- if you want to take your passport
when you go vote, you can take it. Or if you want to
take your driver's license, you can take it; right?

A. Right.

Q. If you had one in your car and don't have the
other, you can pick the one you want; right?

A. Right.

Q. Okay. And have you had any problems,
personally, voting with S.B. 14 in effect?

A. No, sir.

Q. Okay. Are you married?

A. No, sir.

Q. Okay. Has anyone in your immediate family had
any problems with the requirements of S.B. 14 voting?

A. No, sir.

Q. Okay. Are you personally acquainted with any
friends or neighbors who have told you that they cannot
obtain the necessary photo ID to allow them to vote?

A. No, sir.

Q. Okay. Do you attend a church?

A. Yes, sir.

Q. Okay. Do election discussions ever come up
during church, before or after?

A. Yes.

Q. I would think so. Has anyone told you at
church that they have not been able to obtain the
appropriate ID to allow them to vote in elections?

A. No. No, sir.

Q. Okay. If anyone was to tell you that they were having difficulty obtaining the appropriate photo ID to vote in an election, what would you tell them?

A. Well, I can make recommendations. Or it depends on how old they are, I would probably tell them to vote by mail.

Q. Okay. And I think you mentioned earlier that more and more senior citizens seem to be voting by mail.

A. That's correct.

Q. Okay. And does voting by mail -- that's not something everybody gets to do; right?

A. No, there's requirements.

Q. Right. I mean, I would like to vote by mail, but I can't because I'm not over 65; right?

A. Uh-huh.

Q. Has anybody told you that they don't want to vote by mail but are just doing so because they can't get an ID?

A. No.

Q. Okay. Do you attend the county Commissioners Court hearings?

A. Every day -- every Monday.

Q. Okay. And does the public attend those
hearings also?

A. Sometimes, yes, sir.

Q. Okay. During those hearings, have you heard any of the citizens of Jefferson County making complaints to the Commissioners Court that they have been unable to obtain photo IDs that would allow them to vote?

A. No, sir.

Q. Okay. Has that issue even come up, to your knowledge, at any of the Commissioners Court hearings that you've attended?

A. No, it has not.

Q. Okay. Have you found the Commissioners Court to be supportive of your efforts to educate voters about S.B. 14's requirements?

A. They have been.

Q. Okay.

A. They could give me some more money.

Q. Okay. We would all like more money; right?

A. Yeah.

Q. Okay. Have they -- putting S.B. 14 aside for the moment, has the Commissioners Court generally been supportive of your office's attempt to educate the voters about any election issues?

A. Yes, sir.
Q. Okay. In other words, your efforts to educate voters did not begin when S.B. 14 went into effect; correct?
A. No, sir.
Q. There was lots of issues that you work to educate voters on that have nothing to do with S.B. 14; correct?
A. Yes, sir.
Q. Could you tell us about -- I guess, S.B. 14 came into effect, or was implemented, or began to be implemented in 2013. What type of issues do you recall between 2004 and 2013? What type of educational issues did your office undertake with respect to voters?
A. Well, I guess the first one is when we went electronically, we changed from punch cards to voting electronically. So, of course, we had to educate voters on that. That was the first voter education that we did.
Q. Okay. And was that after the --
A. That was in 2006.
Q. Okay. And who paid for that voter education?
A. Actually, we had HAVA grant money to do that. That was federally funded.
Q. Okay. All right. Any other issues that you
can recall, educational issues?

A. After HAVA, recently we went to vote centers, so we're able to vote countywide now on election day.

Q. Okay.

A. Commissioners paid for that, so that we can educate people as far as being able to vote on election day anywhere in the county.

Q. Okay.

A. We've done some voter education on that this past year.

Q. Do you undertake any type of voter education just with respect to when the primaries are going to be held, you know, locations, times, that type of thing?

A. Yeah, we've done that on polling location changes.

Q. Okay.

A. Early voting.

Q. Okay.

A. Where to vote.

Q. And who pays for that type of advertising?

A. The Commissioners Court.

Q. Okay. Now, how would you characterize your office's working relationship with the Texas Secretary of State elections division?

A. We have a good working relationship with them.
Q. Okay. And if you have a question about S.B. 14, or anything else, are you able to contact the Secretary of State's office and ask those questions?
A. Yes.
Q. And are they responsive to you?
A. Yes.
Q. Okay. Are there people in the election division that you know personally by name, that you call when you have a question about something?
A. The ones that's left.
Q. I know there's been some changes.
A. They had a big turnover, yes.
Q. Right. Who are the ones that are still there that you can call and ask a question to?
A. Well, I guess Melanie Huff is still there. I think Melanie Huff is still there.
Q. I believe so.
A. Mostly, I talk to the elections fund division which is Dan Glosterman.
Q. Okay. So if you have a question on elections, at least from the state side, or the Secretary of State's side, they are there willing to talk to you and willing to give you the answers; correct?
A. Right.
Q. Okay. And also, do you receive e-mails
frequently from the Secretary of State's office?

A. We get advisories all the time.

Q. Okay. And do those come out on a fairly frequent basis?

A. Yes, they do.

Q. Okay. And what type of advisories do you typically get from the Secretary of State's office?

A. Just like when we got the advisory to update when they decided to implement the photo ID, when it was going to go into effect, just those type of advisories.

Q. Okay. Who develops the various types of forms that were used in elections?

A. I guess they come from the Secretary of State.

Q. Okay. The Secretary of State is the -- I can't think of the word. They give the form to the various counties to duplicate; correct?

A. Right.

Q. They give you the template, that's what I'm trying to think of.

A. Right.

Q. And then Jefferson County pays to duplicate or
create those forms; correct?

A. Right.

Q. Okay. And has that been the system since you've been in office, or came into office in 2004?

A. Yes.

Q. Okay. Has anything about the passage of S.B. 14 changed the process between what Jefferson County pays for in terms of generating the forms that are used in elections?

A. I don't quite understand the question.

Q. Okay. You testified -- there was a lot of testimony and questioning earlier about the cost to the county in generating certain forms and certain activities with respect to S.B. 14.

My question is: Before S.B. 14 came into effect, was the county responsible for the cost of all the forms it created or duplicated after the Secretary of State gave the forms to the county?

A. Yeah, we were responsible for our forms.

Q. Okay. And that was the same before S.B. 14 came into effect as it is today; correct?

A. That's correct.

Q. All right. So S.B. 14 has not cost the county any more money with respect to the duplication of forms, or any more money than it would have been paying prior
to S.B. 14; correct?

A. Well, I don’t necessarily agree with that. It costs more in the fact that we had to change forms that we had an abundance of, yeah.

Q. Okay. But every time there's a change in the template of forms that the Secretary of State sends to the counties --

A. Right.

Q. -- then the counties bear that cost; correct?

A. Right.

Q. Whether it be because of S.B. 14 or with respect to some other issued with the form?

A. Right.

Q. S.B. 14 was not an unusual situation in that it required the counties to expend monies to change the forms that were going to be used; correct?

A. Right. It was just another unfunded mandate.

Q. Right.

A. We're kind of used to those.

Q. Right.

A. Yeah.

Q. And most of the election activities of the count is unfunded mandates from the state; correct?

A. Unfortunately.

Q. From the state or the federal government;
correct?

A. Right.

Q. Okay. And speaking of the federal government, has the Department of Justice offered to come in and help educate voters with respect to the requirements S.B. 14?

A. No, they have not.

Q. Okay. Has the Department of Justice contacted your office and given any suggestions on how to help the citizens and the voters of Jefferson County get a handle on this voter ID issue?

A. No, they have not.

Q. Has any groups or private organizations contacted you and offered to give you assistance in educating voters of Jefferson County about the requirements of S.B. 14?

A. No, they have not.

Q. Okay. Are you familiar with who the various plaintiffs are in this particular lawsuit that we are here today -- here on today?

A. I'm familiar with a few of them.

Q. Okay. To your knowledge, has any of the plaintiffs in the lawsuit we're here on today contacted you and offered to work with your office in an effort to make certain that all the voters of Jefferson County are
educated about how -- about the requirements of S.B. 14?

A. No, they have not.

Q. Okay. Would you welcome that assistance if they were to offer it?

A. Yes, I would.

Q. Okay. Now, S.B. 14 was implemented, I think, in June of 2013; correct?

A. Right.

Q. And then the next election in which it was put into place was the constitutional amendment election in November of 2013; correct?

A. That's correct.

Q. Okay. And I believe you testified that there were no provisional ballots cast during the 2013 constitutional amendment election.

A. That's correct.

Q. Okay. Did anyone come to you while the election was going on, the 2013 constitutional amendment election, and tell that you there was some issue with respect to S.B. 14 that was causing problems at any of the polling locations?

A. No one did.

Q. Okay. Do you know of anyone being turned away from the polls during the constitutional election constitutional amendment election of 2013 because they
1. Did you have a photo ID?

   A. No, I do not.

2. Q. Okay. Now, you mentioned earlier that there may have been some issues with respect to substantially-similar names in the 2013 constitutional amendment election; is that correct?

   A. I think it was in the March primary elections, sir.

   Q. Okay. Well, let me ask it this way then: During the constitutional amendment election of 2013, to your knowledge, was there any issues raised to you with respect to problems caused by the substantially-similar name aspect of S.B. 14?

   A. Were there any problems raised?

   Q. Right.

   A. Not that I'm aware of.

   Q. Okay. Now, you testified in -- and I guess we'll get more into it in 2014, but you testified that you think that there is an affidavit form that a voter has to filled out when their name is substantially similar, but not an exact match; is that correct?

   A. That's correct.

   Q. Okay. Have you heard of the terminology "combination form"?

   A. Yes, sir.