relayed to the voter as to why they're having to do a
provisional ID -- or provisional ballot?

A. Well, that would be kind of confusing because
if it doesn't -- if the photo ID doesn't match, I don't
know how you could cure a provisional ballot if you're
saying the photo don't match. What is the voter
registrar going to do with that at that time?

Q. Well, if somebody shows up with an ID that
just does not match --

A. Yeah.

Q. -- in a period, you look at it, and this is
not the same person.

A. So what would you do with it?

Q. Do you allow that person to vote a provisional
ballot, or what do you do with them?

A. I don't know. I've never ran across that.

But, I mean, I really don't know.

Q. Okay. Would they do a substantially-similar
name affidavit?

A. That has nothing to do with the name. You're
talking about looking at somebody and seeing that's not
you, so I don't know.

Q. Okay. Would that person have the opportunity
to walk away if they don't want to vote at that point,
if someone confronts them and says, "Well, you know,
1. this doesn't appear to match"?

2. A. Yeah.

3. Q. Would they be arrested there on the spot?

4. A. I don't know.

5. Q. All right. We'll move on.

6. A. I really don't know.

7. Q. Okay.

8. A. So you want to talk about the other provisional ballots?

9. Q. Yes. We're into the runoff election; correct?

10. A. Right.

11. Q. All right. So we have provisional -- how many provisional pallets?

12. A. We had 11.

13. Q. And how many of those related to --

14. A. I think it's three.

15. Q. Related to --

16. A. Photo ID.

17. Q. Right.

18. A. And these two are "no ID presented," "failed to present ID," one, twice. Two of them are fail to present ID, and one of them is just does not have acceptable ID. Whatever that means.

19. Q. Okay. Were any of those cured?

20. A. No, sir.
Q. Okay. And was one of those the lady you were talking about?

A. Yes, sir, Ms. Allen.

Q. And she came and talked to you personally?

A. No, I spoke to her over the phone.

Q. Okay. And she related that she was aware of the cure process; correct?

A. Yes.

Q. Just she got confused about the timing of it; correct?

A. Which day, yes.

Q. Okay. Did she have any complaints with the information she was provided at the poll when they allowed her to vote provisionally?

A. Well, yes, because she was -- her complaint was when was the actual six days, and when did the six days begin, and when was the last day to cure.

So I don't know what the mix-up was as far as the six days, six days from when, and when was her sixth day to cure.

Q. Does it indicate whether she voted early or on the day of the actual election?

A. This was for the -- let me see. I can look at it and see. It says six days to cure. So I don't know what date.
Q. It doesn't indicate whether it was an early vote, or on election day?
A. No. But the six days they should have from the date of the election.
Q. Okay. When a person votes with a provisional ballot, is there a procedure that the poll worker is required to go through in terms of telling them what the provisional ballot is, and what they have to do to cure it?
A. Right. And they have a form they put them on. They have a provisional ballot list they put them on. They also have a notice of provisional ballot which explains to the voter, you know, why they are a provisional ballot.
It should have had a date on there, the date that she has to cure it by. She should have been given that notice as well.
Q. Okay.
A. It should have had the date for her to come in by.
Q. And that part of that notice, it tells when to come in and where to come in; correct?
A. Right.
Q. And what was her name, Addie?
A. Addie Allen.
Q. Did Addie Allen indicate to you that she had been provided that written information?
A. She said she was provided that information, but I never did see what she was looking at.

Q. Okay. So she didn't complain that somebody at the polling station had done something wrong, she just misunderstood something about the information?
A. Well, according to Ms. Allen, you know, from the date she gave me, it would have been the day after the date to cure.

But like I said, without me seeing what she was given, I can't confirm or deny that she was given the correct information.

Q. Okay. And the other two individuals that voted provisionally, you had no contact with?
A. No contact.

Q. Okay. So have we covered all the elections that have occurred after June of 2013?
A. Yes, sir.

Q. Okay. And then there's another election coming up here shortly; correct?
A. Early voting starts Monday.

Q. Okay. Based upon the five elections in Jefferson -- or four. Based upon the five elections that's occurred in Jefferson County after S.B. 14 has
become implemented or became implemented, do you, based
upon that experience, have any reason to think S.B. 14
has prevented people from voting in Jefferson County?
A. I don't think it's prevented people from
voting.
Q. Do you see anything in the numbers of those
elections that would indicate to you that there has been
a decrease in voting in Jefferson County after the
implementation of S.B. 14?
A. No, sir.
Q. Has anyone complained to you that the actual
process of voting has been slowed down because of the
requirements of S.B. 14?
A. Well, the election workers do complain it
takes them longer to process voters with the driver's
license than with the voter registration cards.
Q. Has there been any complaints from the voters,
to your knowledge, that it's taking them too long to
vote because of the S.B. 14 requirements?
A. No, sir. I've not gotten any complaints from
the voters.
Q. Okay. To your knowledge, has anyone in your
office gotten any complaints from your voters that it's
taking too long to vote because of the S.B. 14
identification requirements?
A. No, sir, not to my knowledge.

Q. Okay. And you mentioned some of the poll workers were complaining it was taking longer. Did any of them -- did any of those complaints relate to voters telling the poll workers -- or complaining to the poll workers that it was taking too long for the voters to vote, or was it the poll workers complaining that they were having to do additional work?

A. Well, I don't think it was complaining because they have to do additional work. I think it takes them longer to process the voters with the driver's license, because not all the driver's licenses will scan in our system. Only the new driver's licenses will scan. The old ones won't.

Whereas, with the voter registration cards, all the voter registration cards will scan. So it takes much -- it's a much quicker process to scan the cards. I don't know why the old licenses won't scan.

So it slows down the process when they have to type it in versus just pop and scan.

Q. Have any of the poll workers related that the voters are complaining about the time it took to vote?

A. No, sir, I guess not.

Q. Okay. Does your office send out the voter registration cards?
A. No, sir, we don't.

Q. Who does?

A. The voter registrar, tax assessor/collector.

Q. Do you know what information is printed on the voter registration cards?

A. Like?

Q. That are sent out.

A. Well, like name, address.

Q. Do you know whether or not on the current voter registration card, whether or not it contains on the back of the card the S.B. 14 photo ID requirements?

A. No, sir, I don't know that.

Q. That's not something your office deals with?

A. No, sir.

Q. You mentioned that you have two offices?

A. Yes, sir.

Q. Okay. Where are the -- both offices?

A. Here is the main location, and Port Arthur is the substation.

Q. Okay. What are the office hours of your main office?

A. We're open 8:00 to 4:30 to the public. We're open until 5:00 to answer the phone, until 5:00, but we close to the public at 4:30.

Q. Okay.
A. Because we still have to balance. Same thing at the sub office.

Q. Okay.

A. Monday through Friday.

Q. Okay. From 8:00 to 4:30?

A. Yes.

Q. And are you ever open on weekends?

A. No, sir.

Q. Ever open any late nights for any reason?

A. Only during the election time.

Q. Okay. And is that open to the public, or is that just --

A. No, sir.

Q. That's just the office being working -- working not open to the public?

A. That's correct.

Q. All right. Does the county clerk's office issue now any type of photo ID?

A. No, sir, we don't.

Q. For your employees, or anything else?

A. No, sir. That's done through the human resource department.

Q. Okay. In dealing with the public, is there ever any times that your office requires public persons who come in, or public that comes in, for services to
show ID?

A. To show an ID?

Q. Right.

A. Well, you have to show ID, like, to get a marriage license, and for certain documentation that's not public to everyone.

Q. Okay. So if somebody comes in and wants to obtain those documents, then they have to have some proof of who they are; correct?

A. Absolutely.

Q. What type of ID, generally, does your office require for that situation?

A. A photo ID.

Q. Any particular type of photo IDs?

A. No, just a photo ID.

Q. What about when somebody writes a check, or something of that nature, do you require an ID?

A. Yes, sir.

Q. What type of ID?

A. Normally, a driver's license.

Q. Or if they pay by credit card, do you require an ID?

A. Yes, sir.

Q. Okay. Do you find many customers complaining about the fact that you request them to show an ID when
they obtain these services?

A. No, sir.

Q. Do you ever recall someone complaining it was improper to ask them to show an ID in order to obtain these services?

A. No, sir.

Q. Why do you think that is?

A. It's protocol.

Q. Probably because people expect to show IDs; correct?

A. Yes, sir.

Q. You're inside the metal detectors inside this building; correct?

A. Yes, sir.

Q. When people are coming into this building, are they required to show photo ID?

A. No, sir.

Q. You just go through the metal detector?

A. That's correct.

Q. Okay. Whose idea was it to send out with the tax -- property tax statement, I assume?

A. Right.

Q. Whose idea was it to send out, with property tax statements, the S.B. 14 information?

A. It was mine.
Q. Why did you do that?
A. Because it was the cheapest way I could think to reach all the people in Jefferson County.

Q. Okay. And do you think that was effective?
A. I hope so.

Q. Okay. Do you think that the efforts of Jefferson County, in general, have been successful on educating your public, your voting public about the requirement of S.B. 14?
A. I think so.

Q. Do you have occasion on a regular basis to meet with people from the Secretary of State's office with respect to elections?
A. Probably once a year when we go to the election law seminar.

Q. And is that held in Austin?
A. Yes.

Q. What's the purpose of that seminar?
A. It's just to refresh our education on the rules and guidelines for elections, and especially during the legislative year, updates.

Q. That helps you to get to know the people in that office and bounce ideas back and forth?
A. Right.

Q. Do you find you have a good working
relationship --

A. Yes.

Q. -- with the Secretary of State's election division?

A. Yes.

Q. Do you think that they try to be helpful and responsive to your needs?

A. Yes.

Q. Do you think they -- it's their intent to try to get as many people to vote as possible in the state?

A. Yes.

MR. GEAR: Objection; calls for speculation. Form.

Q. (By Mr. Keister) They do their best to work with the counties and assist the counties in getting the voters to vote?

A. Yes.

Q. Okay. Lamar University is within Jefferson County; correct?

A. That's correct.

Q. Are there any other universities here?

A. No. We have Kaplan University, it's like a college.

Q. Do you have contact with the university administrators with respect to voting issues as
Q. Have you heard any complaints of Lamar University, or from the students of Lamar University that they haven't been able to vote because of the S.B. 14 requirements?

A. I have not.

Q. Okay. On Exhibit 1, which was the various hypotheticals with respect to different scenarios of whether or not names match -- whether or not the name on the poll book matches the driver's license numbers, can you give an accurate answer to any of those examples as to whether or not they would or would not be similar names, without actually seeing an ID itself and matching it to the poll book?

A. No, I could not.

Q. Okay. Just looking at the words printed on the paper is not the same as looking at an ID and looking at the person that presented it; correct?

A. That's correct.

Q. Okay. With respect to the cost of documents for an EIC, election identification certificate, if a person is in possession of a certified copy of their birth certificate and they have had it for years, and
they go down to get an EIC, that's not going to cost
them any money; correct?

A. Well, it should not, but I don't make that
call for DPS. I would assume they should be able to use
that.

Q. Right. Just because your office, or any other
office charges a fee for a document, a replacement
document, doesn't mean everybody that goes to get an EIC
has to pay for that document; correct? In other words,
some people have those documents already; correct?

A. Yes, sir.

Q. All right. And that's not an uncommon
situation for people to have a copy of their birth
certificate; correct?

MR. GEAR: Objection; form. Calls for
speculation.

A. Yes, sir.

Q. (By Mr. Gear) Do you have a copy of your
birth certificate?

A. Yes, sir, I do.

Q. Do parents often keep copies of their
children's birth certificates?

A. Yes, sir.

Q. So if a child doesn't -- if an adult doesn't
have his birth certificate, is there a chance they could