Exhibit D
FLORIDA STATE CONFERENCE OF THE
NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE
(NAACP), as an organization and representative
of its members; et al.;

Plaintiffs,

v. 

KURT S. BROWNING, in his official capacity as
Secretary of State for the State of Florida,

Defendant.

________________________________________

DECLARATION OF KEVIN A. HILL IN SUPPORT OF
THE SECRETARY’S MOTION TO DISMISSE AND IN OPPOSITION
TO PLAINTIFFS’ MOTION FOR PRELIMINARY INJUNCTION

Pursuant to 28 U.S.C. § 1746, Kevin A. Hill submits this Declaration in Support of the
Secretary’s Motion to Dismiss and in Opposition to Plaintiffs’ Motion for Preliminary
Injunction.

1. My name is Kevin A. Hill, and I live in Broward County, Florida. My business
address is Florida International University, 11200 S.W. 8th Street, Miami, Florida 33199.

2. I am a U.S. citizen and over the age of eighteen. I have never been convicted of a
felony, and I have not been declared mentally incompetent by a court.

3. I am an associate professor of Political Science at Florida International
University. My curriculum vitae is attached to this Declaration.

4. In an academic capacity, I have carefully observed and analyzed Florida politics
since at least 1990.
5. I have reviewed the key papers in this case, including the Complaint, the Motion to Dismiss, the Response and Reply thereto, and Plaintiff's Motion for Preliminary Injunction.

6. I am familiar with the provisions and interrelationships of Florida's Election Code. Based upon my understanding of the operation of Florida's Election Code, Section 97.053(6), Florida Statutes (2007), is a crucial provision that serves important state interests of preventing elections fraud.

7. As an academic observer of Florida's political system, I am familiar with incidents of election fraud in its various manifestations. I have been asked to testify about election fraud in Florida, and I am prepared to do so.

8. Voter fraud in Florida is not merely hypothetical. There have been well documented incidents of voter fraud throughout Florida's history.

9. Eliminating voter fraud in its entirety is not possible. Nevertheless, state regulation can reduce voter fraud by restricting the available common avenues for such fraud. By requiring efforts to verify the identity of voter registration applicants, Florida has made it less likely that false or fraudulent applications will be accepted. Fewer fraudulent registrations will lead to fewer fraudulent votes.

10. By making voter fraud less likely, the challenged law will improve voter confidence, which is critical to successful elections and enhancing public confidence in the electoral process. Voters who believe that elections are not honest and fair will be less likely to participate democratically, fearing their vote will be offset by fraudulent ones.
I declare under penalty of perjury that the foregoing is true and correct.

Executed at _MIAMI_ _FLORIDA_, Florida, on November 21, 2007.

[Signature]

Kevin A. Hill
Kevin A. Hill, Ph.D.
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Education:

Degrees:


1991 M.A., Political Science, University of Florida.


Other Education:

1992 ICPSR Summer Program in Quantitative Methods, University of Michigan. Fields of Concentration: Maximum Likelihood Estimation, Multivariate Statistical Methods, and Categorical Data Analysis.


1989 Visiting Post-Graduate studies, Department of Political and Administrative Studies, University of Zimbabwe.

1988 Intensive study of Zulu/Ndebele, Yale University.
Publications:

A. Books


B. Refereed Journal Articles:


**E. Electronic**

1. A series of World Wide Web pages for Saint Martin’s Press on political science. This group of pages contains approximately 1000 links to Internet political...


Professional Experience
Invited Presentations


11. Lecture to the American Association of University Women on "Elections in the New South Africa" (March 1994).

Recent Conferences


Site Coordinator, Florida Political Science Association 2006 meeting at Florida International University.

Undergraduate Advisor, Department of Political Science, Florida International University, 1999-2002; 2005-present.

Associate Professor of Political Science, Florida International University, 1998-present.

Assistant Professor of Political Science, Florida International University, 1993-1998.

Public Opinion Pollster, Campaign Data, Inc. Have fielded and analyzed 150+ public opinion polls in Miami-Dade, Broward, Monroe, Collier, Hendry, and Palm Beach counties, as well as nationwide, 1996-2005.

Webmaster and Web Site Creator, Department of Political Science, and Jack Gordon Institute for Public Policy and Citizenship Studies, both at Florida International University.

Research Associate at the University of Zimbabwe, Department of Political and Administrative Studies, 1992-1993. Affiliated with this department while doing field work for dissertation.

Associate Director of the Florida Consortium for Political Research, August 1990-May 1992. Duties included maintaining the machine readable data archives of the nation's fifth largest consumer of ICPSR social science data, maintaining two computer networks, and offering computer and statistical consultation to faculty, staff, and graduate students.

Tutorials Leader for the Development Administration course for advanced undergraduates, University of Zimbabwe, 1989. Directed "British style" tutorials for three sections of thirty students each. Duties included stimulating debates about development topics, leading discussions of working papers, and grading undergraduate research. Some lectures were also offered.

Research Assistant to Dr. Kenneth Wald, University of Florida, August-December 1988; and to Dr. Michael Martinez, Jan.-May 1990.

Legislative Assistant at the Washington Office on Africa, a lobbying organization in Washington, DC; March-June 1987.

Honors and Awards

Faculty Senate Excellence in Undergraduate Advising Award, Florida
Teaching Incentive Program (TIP) Award for excellence in teaching, Florida International University, 1997.


Bradshaw-Feaster Award for General Excellence, Ulmer Political Science Medal, and Phi Beta Kappa membership, Furman University, June 1988.

Finalist for the Rhodes Scholarship in 1987. Won the South Carolina competition, and was one of only 100 undergraduate students in the U.S. to reach the final round of selection.

Research Grants/Contracts


City of Miami Redistricting. 2003. $40,000.


National Science Foundation Grant # SES-9123116 for research in Zimbabwe, $8,000, 1991.

Expert Witness

State of Florida v. Juri, 2005