No.			

IN THE SUPREME COURT OF TEXAS

In re JUAN GERARDO PEREZ PICHARDO AND PUBLIC INTEREST LEGAL FOUNDATION, INC.

Relators

Ann Harris Bennett, in her official capacity as Voter Registrar for Harris County, Texas, Respondent

PETITION FOR WRIT OF MANDAMUS

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STATEMENT OF THE CASE

Nature of the Case

Respondent's office has consistently approved applications for voter registration for facially ineligible registrants. In particular, Respondent registers to vote applicants that do not affirm and answer "YES" to the question "Are you a United States citizen?" and also answer "NO" to the same question, even though Texas law requires her to reject those applications. Tex. Elec. Code § 13.072(c).

Respondent

Ann Harris Bennett, in her official capacity as voter registrar for Harris County, Texas.

Relief Requested

Respondent should be required to reject, challenge, or investigate all applications that do not contain a "YES" answer to the question "Are you a United States citizen?" and to undertake (or allow) a complete review of any original voter applications in order to catalog and take appropriate action on all other applications where the applicant states under penalty of perjury they are not a United States citizen.

Disposition in Court of Appeals

An original petition for writ of mandamus requesting the same relief was filed in the Fourteenth Court of Appeals on October 6, 2020. The petition was considered by Justices Spain, Hassan, and Poissant. The panel denied the petition in a per curiam memorandum filed on October 8, 2020. Memorandum Opinion, *In re Pichardo et al.*, No. 14-20-00685-CV (filed Oct. 8, 2020) (orig. proceeding), available at Appendix Page 184.

STATEMENT OF JURISDICTION

This Court has jurisdiction over this petition for a writ of mandamus. *See*Tex. Election Code § 273.061 ("The supreme court or a court of appeals may issue a writ of mandamus to compel the performance of any duty imposed by law in connection with the holding of an election or a political party convention, regardless of whether the person responsible for performing the duty is a public officer.").

STATEMENT REGARDING ORAL ARGUMENT AND REQUEST FOR EXPEDITED BRIEFING AND DECISION

Harris County began mailing absentee ballots in "mid-September." Early in-person voting begins October 13, 2020.² The 2020 General Election will take place November 3, 2020. The records at issue and those supporting this petition are familiar to Respondent because they originate from the Respondent's office. Therefore, Relators respectfully request that the Court expedite this petition by requesting a response no later than October 13, 2020, and a reply no later than October 15, 2020, with a decision to be issued by October 16, 2020. *See Davis v. Taylor*, 930 S.W.2d 581, 582 (Tex. 1996) (expediting briefing and oral argument in election-related proceeding).

Because the duties described herein are clear and mandatory, the petition can be granted without oral argument.

¹ https://www.harrisvotes.com/Docs/VotingInfo/VotingByMailFAQs_en-US.pdf (last accessed October 5, 2020).

² https://www.harrisvotes.com/Docs/VotingInfo/VotingByMailFAQs_en-US.pdf (last accessed October 5, 2020).

STATEMENT OF THE ISSUES PRESENTED

- 1. Is Respondent failing to perform her nondiscretionary, ministerial duties to review and reject, challenge, or investigate applications for voter registration that contain a "NO" answer to the question "Are you a United States citizen?"
- 2. Is Respondent failing to perform her nondiscretionary, ministerial duties to review and reject, challenge, or investigate applications for voter registration that do not contain a "YES" answer to the question "Are you a United States citizen?"

INTRODUCTION

United States citizenship is a requirement for voter registration in Texas.

Tex. Elec. Code § 13.001(a)(2). Yet Respondent's office has for years consistently approved applications for voter registration that do not contain a "YES" answer to the question "Are you a United States citizen?" Those approved applications either contain a "NO" answer or do not contain an answer at all.

Registrar Bennett has no discretion to approve applications that do not contain a "YES" answer to the citizenship question. Rather, Texas law is clear that Registrar Bennett "shall reject th[ose] application[s]." Tex. Elec. Code § 13.072(c) (emphasis added). The records included in the attached Appendix demonstrate that she is not complying with her ministerial duty to reject insufficient applications.

When an applicant marks "NO" to the citizenship question under penalty of perjury, but is registered to vote anyway, the resulting harm is significant. If in fact the applicant is *not* a United States citizen, registration alone can cause problems and delays during any subsequent naturalization process. If the registrant casts a vote—even if under the mistaken belief that she can—she may subject herself to severe penalties. Even one ineligible vote cast by accident cancels out the vote of another Texan.

However, for purposes of this petition, it makes no difference whether the applicant is or is not a citizen of the United States. What matters is whether the

applicant and Registrar Bennett have complied with the requirements of Texas law because "compliance with state election laws . . . is mandatory." *Bejarano v. Hunter*, 899 S.W.2d 346, 350 (Tex. App. 1995). "Failure to perform her duty subjects [Registrar Bennett] to mandamus." *Id*.

STATEMENT OF FACTS

Juan Gerardo Perez Pichardo

Juan Gerardo Perez Pichardo ("Mr. Pichardo") is a registered voter in Harris County, Texas. App. at 170. Mr. Pichardo was born in 1942 in Mexico. App. at 170. In 1969, Mr. Pichardo immigrated to the United States of America and became a legal permanent resident. App. at 170. In 2000, Mr. Pichardo became a naturalized citizen of the United States of America. App. at 170. Mr. Pichardo intends to vote in the 2020 General Election and in other future elections in Harris County, Texas. App. at 170.

The Foundation's Purpose and Mission

The Public Interest Legal Foundation, Inc. (the "Foundation") is a non-partisan, public interest organization incorporated and based in Indianapolis, Indiana. Appendix ("App.") at 2. The Foundation's mission is to promote the integrity of elections nationwide through research, education, remedial programs, and litigation. App. at 2. The Foundation also seeks to ensure that voter qualification laws and election administration procedures are followed. App. at 2. Specifically, the Foundation seeks to ensure that the nation's voter rolls are accurate and current, working with election administrators nationwide and educating the public about the same. App. at 2. The Foundation relies on state and

federal open records laws to assess the accuracy of voter registration records and compliance with voter list maintenance laws. App. at 2-3.

After More than Two Years of Litigation, the Foundation Obtains Voter List Maintenance Records from Registrar Bennett

In December 2017, the Foundation submitted a request to Registrar Bennett asking to inspect or receive copies of records concerning Registrar Bennett's programs and activities conducted for the purpose of ensuring the accuracy of the voter roll. App. at 3. The request was made pursuant to the open records provision of the National Voter Registration Act of 1993 ("NVRA"), 52 U.S.C. § 20507(i). App. at 3. Registrar Bennett refused to provide access to the requested records and the Foundation thereafter filed an action in federal court to compel Registrar Bennett's compliance with the NVRA, *Public Interest Legal Foundation v. Bennett*, No. 4:18-cv-00981 (S.D. Tex., filed March 29, 2018). App. at 3.

More than two years after the request for records was made—and after her motion to dismiss was denied³—Registrar Bennett agreed to resolve the dispute through a court-ordered settlement. App. at 3. On March 17, 2020, the court entered the Agreed Order, which obligates Registrar Bennett to provide to the Foundation approximately seven years of voter list maintenance records, *See* Doc.

³ Public Interest Legal Found. v. Bennett, No. 4:18-CV-00981, 2019 U.S. Dist. LEXIS 38686 (S.D. Tex. Mar. 11, 2019), adopting recommendation of Public Interest Legal Found. v. Bennett, No. H-18-0981, 2019 U.S. Dist. LEXIS 39723 (S.D. Tex. Feb. 6, 2019).

76, *Public Interest Legal Foundation v. Bennett*, No. 4:18-cv-00981 (S.D. Tex., filed March 13, 2020). App. at 3-4. Although the Agreed Order obligated Registrar Bennett to produce all records within ninety days of entry of the order—or by June 15, 2020—Registrar Bennett began producing records on a rolling basis on June 22, 2020. App. at 4. As of the date of this Petition, the Foundation has not yet received all records to which it is entitled under the terms of the Agreed Order. App. at 4. This delay in compliance with both federal laws mandating disclosure and indeed even the Agreed Order to disclose records is relevant as it impairs, if not extinguishes entirely, the equitable defense of laches to this action.

The Foundation incurred substantial costs obtaining Registrar Bennett's voter list maintenance records. App. at 4. After entry of the Agreed Order, the Foundation moved for an award of attorneys fees, costs, and expenses reasonably expended in the litigation in an amount totaling more than \$210,000, Doc. 85, *Public Interest Legal Foundation v. Bennett*, No. 4:18-cv-00981 (S.D. Tex., filed March 13, 2020). App. at 4. The Foundation has incurred additional costs of time and money reviewing and cataloging the records and analyzing Registrar Bennett's compliance with state and federal voter list maintenance laws. App. at 4.

Registrar Bennett's Ministerial Duties Under the Texas Election Code

"To be eligible for registration as a voter in [Texas], a person must . . . be a United States citizen[.]" Tex. Elec. Code § 13.001(a)(2). "A person desiring to

register to vote must submit an application to the registrar of the county in which the person resides." Tex. Elec. Code § 13.002(a). The "registration application must include . . . a statement that the applicant is a United States citizen." Tex. Elec. Code § 13.002(c)(3). Both the Texas voter registration application and the federal voter registration application ask the applicant to affirm his or her citizenship by checking "YES" or "NO" to a variation of the question "Are you a United States citizen?" The Texas voter registration form instructs that the citizenship question "MUST BE COMPLETED BEFORE PROCEEDING." The Texas Election Code provides, "The registrar shall review each submitted application for registration to determine whether it complies with Section 13.002 and indicates that the applicant is eligible for registration." Tex. Elec. Code § 13.071(a) (emphasis added). "[I]f the registrar determines that an application does not comply with Section 13.002 or does not indicate that the applicant is eligible for registration, the registrar shall reject the application." Tex. Elec. Code § 13.072(c) (emphasis added). Furthermore, "[if] after determining that an application complies with Section 13.002 and indicates that the applicant is eligible for registration, the registrar has reason to believe the applicant is not eligible for

⁴ See Section 1, Texas Voter Registration Application, available at https://eforms.com/download/2017/10/Texas-Voter-Registration-Application.pdf (last accessed October 5, 2020).

⁵ *Id*.

registration or the application was submitted in an unauthorized manner, the registrar shall challenge the applicant." Tex. Elec. Code § 13.074(a). Registrar Bennett "may use any lawful means to investigate whether a registered voter is currently eligible for registration in the county" so long as the investigation is not "based solely on residence." Tex. Elec. Code § 16.033(a). If Registrar Bennett "has reason to believe that a voter is no longer eligible for registration, the registrar shall deliver written notice to the voter indicating that the voter's registration status is being investigated by the registrar." Tex. Elec. Code § 16.033(b). Registrar Bennett "shall cancel a voter's registration if" the voter confirms she is ineligible, no reply is received within thirty days, or the notice is returned undeliverable with no forwarding information. Tex. Elec. Code § 16.033(d).

Records Received from Registrar Bennett

1. Registrar Bennett's Office is Approving Voter Applications on Which the Applicant Answered "NO" to the Citizenship Question.

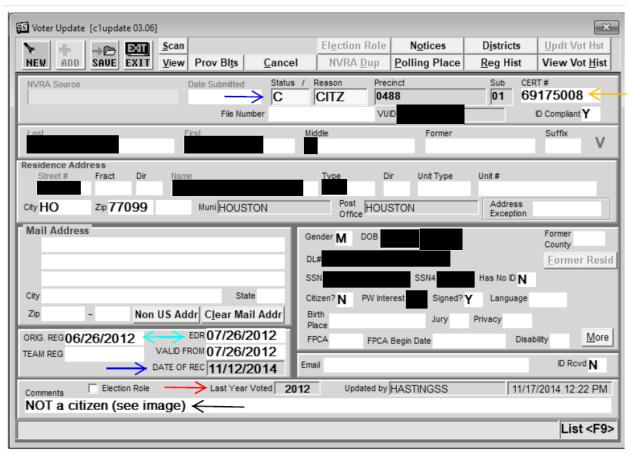
The Appendix to this petition contains true and correct copies of voter list maintenance records obtained from Registrar Bennett relating to applicants who answered "NO" to the citizenship question on the voter registration form but were nevertheless added to the official list of eligible voters. App. at 4-5. Each registrant was later removed from the voter roll after the registrant purportedly made another attestation of non-citizenship or otherwise did not affirm citizenship. App. at 5.

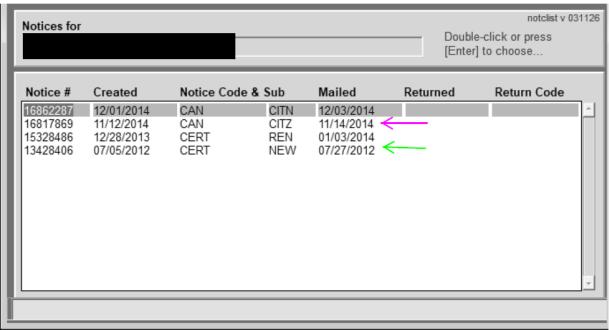
On the following page is a representative example of the records contained in the Appendix. The first image below shows the application for voter registration. App. at 5. The red arrows show that the applicant answered "NO" to the question "Are you a United States Citizen?" App. at 5. The green arrows show that the applicant noted on his form that he was a "legal" resident and "not yet" a United States citizen. App. at 5-6. The blue arrows provide the date the application was completed, June 12, 2012.⁶ App. at 6.

⁶ The records included with this petition came to the Foundation with certain information redacted, such as driver's license and social security numbers. The Foundation has further redacted name, address, birth date, signature information, and voter ID number. If the Court orders, the Foundation will file these records unredacted under seal.

These Questions N	lust Be Complete	300935022	
Check one			
New Application	Change of Address, Name, or Other Information	Request 1	or a Replacement Card
you a United States Citizen		Yes	→ 🛛 № ←
l you be 18 years of age on	-	(XI) Yes	☐ No
you checked 'No' in respon		re, do <u>not comple</u> i	te this form.
you interested in serving a	s an election worker?		
Last Name Include Suffix if any (Jr. Sr. III)	First Name	Middle Name	Former Name (1 any)
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Address)		County	Zip Code
Mailing Address: Street Address	as and Apadment Noveton	Harris	77099 State
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The second image shows a screen capture of the Texas voter registration system. App. at 8. The light blue arrows show two things: the original date of registration of June 26, 2012 ("ORIG. REG") and the effective date of registration of July 26, 2012 ("EDR"). App. at 8. The light green arrow shows that a new registration certificate ("CERT" "NEW") was created for this applicant on July 5, 2012 and mailed out on July 27, 2012. App. at 8. The red arrow shows that the applicant was credited in the system with voting in 2012 ("Last Year Voted"). App. at 8. The two dark blue arrows show that the registration was cancelled ("Status" "C"), the reason for cancellation ("CITZ" or citizenship), and the date the registration was effectively cancelled ("DATE OF REC"). App. at 8. The pink arrow repeats this information and shows further that the registrant received a cancellation letter on November 14, 2014. App. at 8. The black arrow shows comments made by the user. App. at 8. In this instance, the comment reads "NOT a citizen (see image)." App. at 8.





Attachment B to the Churchwell Affidavit, App. at 20-151, contains fortynine (49) examples of this type of record, App. at 10. Attachment D to the Churchwell Affidavit summarizes these records. App. at 10, 167-68. The summary identifies each record using the CERT #, which is found next to the orange arrow in image two, above. App. at 10.

2. Registrar Bennett's Office is Approving Applications on Which the Applicant Did Not Answer the Citizenship Question.

The Appendix to this petition also contains true and correct copies of Registrar Bennett's voter list maintenance records relating to applicants who did not answer the citizenship question on the voter registration form but were nevertheless added to the official list of eligible voters. App. at 5. Each registrant was later removed from the voter roll after the registrant purportedly made a subsequent attestation of non-citizenship or otherwise did not affirm citizenship.⁷ App. at 5.

Attachment C to the Churchwell Affidavit contains six examples of this type of record, each of which is summarized in Attachment D to the Churchwell Affidavit. App. at 5-6. The summary identifies each record using the CERT #, which is found next to the orange arrow in image two, above. App. at 10.

⁷ The records in Attachment C to the Churchwell contain one instance where a registrant is currently listed in the voter registration system as active. *See* App. at 154.

ARGUMENT

I. Mandamus is Appropriate to Compel Compliance with a Non-Discretionary, Ministerial Duty.

"A writ of mandamus will issue to compel a public official to perform a ministerial act." *Anderson v. Seven Points*, 806 S.W.2d 791, 793 (Tex. 1991) (citing *Womack v. Berry*, 156 Tex. 44, 291 S.W.2d 677, 682 (1956); *Turner v. Pruitt*, 161 Tex. 532, 342 S.W.2d 422, 423 (1961)). "An act is ministerial when the law clearly spells out the duty to be performed by the official with sufficient certainty that nothing is left to the exercise of discretion." *Anderson*, 291 S.W.2d at 793. That is the case here.

- II. Registrar Bennett Has a Ministerial Duty to Comply with and Enforce the Requirements of the Texas Election Code.
 - A. Registrar Bennett has a Ministerial Duty to Review Each Application and Ensure that the Applicant Has Checked "YES" to the Citizenship Question.

Texas Election Code Section 13.001(a) provides the requirements for voter registration in Texas. One of those requirements is United States citizenship. Tex. Elec. Code § 13.001(a)(2). "A person desiring to register to vote must submit an application to the registrar of the county in which the person resides," Tex. Elec. Code § 13.002(a), and that "registration application must include . . . a statement that the applicant is a United States citizen." Tex. Elec. Code § 13.002(c)(3).

Texas Election Code Section 13.071(a) provides, "The registrar *shall* review each submitted application for registration to determine whether it complies with Section 13.002 and indicates that the applicant is eligible for registration." Tex. Elec. Code § 13.071(a) (emphasis added). The duty to review each application is not discretionary; it is mandatory. *In re Robinson*, 175 S.W.3d 824, 830 (Tex. App. 2005) ("The use of the word *shall* in a statute is generally construed as creating a nondiscretionary duty."). This duty includes the specific obligation to ensure that each application contains "a statement that the applicant is a United States citizen." Tex. Elec. Code § 13.002(c)(3). The Texas voter registration form requires the applicant to make that statement by checking "YES" to the question "Are you a United States citizen?" Registrar Bennett thus has a ministerial duty to review each application to ensure that the applicant has answered (or checked) "YES" to the citizenship question.

B. Registrar Bennett has a Ministerial Duty to Reject an Application for Voter Registration that Does Not Contain a "YES" Answer to the Citizenship Question.

Texas Election Code Section 13.072(c) provides, "[I]f the registrar determines that an application does not comply with Section 13.002 or does not indicate that the applicant is eligible for registration, the registrar *shall* reject the application." (Emphasis added). The obligation to reject insufficient applications is not discretionary; it is mandatory. *See In re Robinson*, 175 S.W.3d at 830. An

application "does not comply with Section 13.002" and "does not indicate that the applicant is eligible for registration" if the application does not contain a "YES" answer to the citizenship question. *See* Tex. Elec. Code § 13.002(c)(3) (application must contain "a statement that the applicant is a United States citizen"). Registrar Bennett thus has a ministerial duty to reject applications that contain a "NO" answer to the citizenship question or do not contain an answer to the citizenship question. *See Bejarano*, 899 S.W.2d at 350 ("The clerk's duty to reject all insufficient applications for a place on the ballot is ministerial.").8

C. Registrar Bennett has a Ministerial Duty to Challenge or Investigate a Registration That Does Not Include an Application with a "YES" Answer to the Citizenship Question.

Texas Election Code Section 13.074(a) provides, "[if] after determining that an application complies with Section 13.002 and indicates that the applicant is eligible for registration, the registrar has reason to believe the applicant is not eligible for registration or the application was submitted in an unauthorized manner, the registrar *shall* challenge the applicant." (Emphasis added). The duty to challenge ineligible registrants is not discretionary; it is mandatory. *In re Robinson*,

⁸ This is true even though the applicant, by signing the application, affirms he or she is an U.S. Citizen. *See* Section 10, Texas Voter Registration Application, *available at* https://eforms.com/download/2017/10/Texas-Voter-Registration-Application.pdf (last accessed October 5, 2020). The application states that the questions in Section 1, which includes the citizenship question, "MUST BE COMPLETED BEFORE PROCEEDING." *See id.* at Section 1. The applicant is thus instructed to not complete and sign the application unless she first answers the citizenship question.

175 S.W.3d at 830. A registrant is "not eligible for registration" if he or she has submitted an application that does not contain a "YES" answer to the citizenship question. Tex. Elec. Code § 13.002(c)(3) (application must contain "a statement that the applicant is a United States citizen"). Registrar Bennett thus has a ministerial duty to initiate challenge procedures for registrants who have not submitted an application with a "YES" answer to the citizenship question.⁹

Texas Election Code Section 16.033 provides, "If the registrar has reason to believe that a voter is no longer eligible for registration, the registrar *shall* deliver written notice to the voter indicating that the voter's registration status is being investigated by the registrar." Tex. Elec. Code § 16.033(b) (emphasis added). A "registrar has reason to believe that a voter is no longer eligible for registration" if the registrant submitted an application with a "NO" or blank answer to the citizenship question. After delivering the required notice, the "the registrar *shall* cancel a voter's registration if: (1) after considering the voter's reply, the registrar determines that the voter is not eligible for registration; (2) no reply is received from the voter on or before the 30th day after the date the notice is mailed to the voter under Subsection (b); or (3) each notice mailed under Subsection (b) is returned undelivered to the registrar with no forwarding information available."

⁹ The Texas Election Code gives registrars two days to initiate challenge procedures after approving an application. Tex. Elec. Code § 13.074(c). However, Texas Election Code Section 16.033 does not appear to have a time limitation.

Tex. Elec. Code § 16.033(d) (emphasis added). The duty to deliver written notice of investigation to registrants who have given the registrar reason to believe they are ineligible is not discretionary; it is mandatory. *See In re Robinson*, 175 S.W.3d at 830. Registrar Bennett thus has a ministerial duty to initiate investigation and cancellation procedures (where appropriate) for registrants who submitted an application with a "NO" or blank answer to the citizenship question.

III. The Record Demonstrates that Registrar Bennett is Not Complying with Her Ministerial Duties under the Texas Election Code.

The Appendix attached to this petition contains true and correct copies of voter list maintenance records produced by the Respondent concerning registrants who answered "NO" to the citizenship question or did not answer the citizenship question. App. at 4-6. Registrar Bennett had a ministerial duty to reject these applications, but she did not do so. "Failure to perform her duty subjects [Registrar Bennett] to mandamus." *Bejarano v. Hunter*, 899 S.W.2d 346, 350 (Tex. App. 1995). Absent an order compelling Registrar Bennett to comply with her ministerial duties under the Texas Election Code, applications that do not contain "a statement that the applicant is a United States citizen," Tex. Elec. Code § 13.002(c)(3), will continue to be approved.

¹⁰ The Foundation makes no statement as to whether these applicants are or are not United States citizens. The Foundation is stating only that official government records indicate that they answered "NO" to the citizenship question or did not answer the question.

The registrations included in the Appendix were canceled only because each registrant purportedly made a subsequent attestation of non-citizenship after being added to the voter roll. App. at 5. It is therefore nearly assured that additional applicants who did not answer "YES" to the citizenship question remain registered to vote. Absent an order compelling Registrar Bennett to review applications in her possession for sufficiency, Tex. Elec. Code § 13.071(a), and initiate challenge or investigation procedures for registrations that do not include an application containing a "YES" answer to the citizenship question, ineligible registrants may remain registered.

IV. The Foundation Has Standing Because it Is Being Harmed, and Will Continue to be Harmed, Absent Relief.

Registrar Bennett's non-compliance with the law is harming the Foundation and will continue to harm the Foundation, absent relief. As an integral part of its public interest mission, the Foundation disseminates information about compliance by state and local election officials with voter list maintenance statutes. App. at 2. The Foundation also promotes election integrity and compliance with federal and state statutes that ensure the integrity of elections. Registrar Bennett's non-

¹¹ This typically occurs when the registrant submits a subsequent application for voter registration or responds to a jury summons.

¹² Relators are not requesting that any registration be canceled without full compliance with all necessary procedures found in state and/or federal law.

compliance with Texas Law has impaired and will continue to impair the Foundation from carrying out its mission. App. at 2-4.

The Foundation has diverted resources and incurred substantial costs to obtain Registrar Bennett's voter list maintenance records and monitor her compliance with the Texas Election Code. App. at 4. Absent relief, the Foundation will be forced to divert additional resources to Harris County and incur additional costs to continue to engage in similar record gathering and monitoring activities, as well as the promotion of remedial measures. App. at 4. ¹³

V. Mr. Pichardo Has Standing Because He is Threatened With a Violation of His Right to Vote.

"Undeniably the Constitution of the United States protects the right of all qualified citizens to vote, in state as well as in federal elections." *Reynolds v. Sims*, 377 U.S. 533, 554 (1964). This right "can neither be denied outright . . . nor destroyed by alteration of ballots . . . nor diluted by ballot-box stuffing." *Id.* "The right to vote is 'individual and personal in nature,' and 'voters who allege facts showing disadvantage to themselves as individuals have standing to sue' to remedy

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that disadvantage." *Gill v. Whitford*, 138 S. Ct. 1916, 1920 (2018) (quoting *Reynolds*, 377 U. S. at 561 and *Baker v. Carr*, 369 U.S. 186, 206 (1962)).

Mr. Pichardo is a registered voter in Harris County, Texas. App. at 170. Mr. Pichardo intends to vote in the 2020 General Election and in other future elections in Harris County, Texas. App. at 170. The records in the Appendix show that applicants who answered "NO" to the citizenship question were registered to vote anyway. The records further show that Registrar Bennett's office has credited some of those registrants with voting in an election. App. at 167-68. There is thus a real risk that registrants who answered "NO" to the citizenship question (or did not answer the question)—but have not yet been removed from the voter roll—will cast ballots in the 2020 General Election. Mr. Pichardo is therefore at risk of having his vote canceled out by an ineligible vote. The risk of injury to his right to vote gives Mr. Pichardo standing.

VI. Relators Have No Other Adequate Remedy.

"Mandamus will not issue where there is 'a clear and adequate remedy at law[.]" Walker v. Packer, 827 S.W.2d 833, 840 (Tex. 1992) (quoting State v. Walker, 679 S.W.2d 484, 485 (Tex. 1984)). Relators have no such remedy. While the NVRA permits private parties to sue election officials for inadequate voter list maintenance, 52 U.S.C. § 20510(b), the NVRA does not expressly require election officials to conduct voter list maintenance based on the answer to the citizenship

question, see 52 U.S.C. § 20507(a)(3)-(4). The NVRA is therefore not a "clear and adequate remedy." Walker, 827 S.W.2d at 840.

Remedies found in Texas law are also not "clear and adequate" to achieve the remedy sought in this petition. Texas Election Code Section 273.081 is limited to "injunctive relief" to "prevent" violations from occurring. Relators do not seek injunctive relief; they seek affirmative compliance with ministerial duties. It is therefore not "clear" that Section 273.081 is "adequate" under these circumstances.

Even where "a remedy at law may technically exist . . . it may nevertheless be so uncertain, tedious, burdensome, slow, inconvenient, inappropriate or ineffective as to be deemed inadequate." *Smith v. Flack*, 728 S.W.2d 784, 792 (Tex. Crim. App. 1987). Whether mandamus is appropriate "depends heavily on the circumstances and is better guided by general principles than by simple rules." *In re Prudential Ins. Co. of Am.*, 148 S.W.3d 124, 137 (Tex. 2004) (orig. proceeding). Given the proximity to election day and the importance of the issues presented, "the benefits of mandamus review outweigh the detriments." *Id.* at 136. To proceed in any other manner would be too uncertain, slow, inconvenient, and ineffective under these circumstances. *Flack*, 728 S.W.2d at 792.

Finally, the instances presented to this Court of the Respondent failing to comply with Texas law by approving registration applications that do not affirmatively answer "YES" to the citizenship question are only those which were

detected by the Respondent through various circumstances. Unquestionably more exist and have not been detected. In many instances the original application records exist and given the Respondent's past failures to comply with Texas law, this Court should order the Respondent to review—or to permit Relators to review—the universe of original documents to catalog any additional and heretofore undetected instances of failure to comply with Texas law related to the citizenship question.

VII. Conclusion and Prayer for Relief

For these reasons, Relators respectfully request that the Court grant this petition for writ of mandamus and enter an order compelling Registrar Bennett to do the following:

- Review all new applications received for compliance with Texas Election
 Code Section 13.002(c)(3), as required by Texas Election Code Section
 13.071(a);
- 2. Reject any application that contains a "NO" answer to the citizenship question or does not answer "YES" to the citizenship question, as required by Texas Election Code Section 13.072(c);
- 3. Review all previously filed applications of registered voters, or permit the Foundation to review them, and initiate challenge or investigation procedures under Texas Election Code Sections 13.074 or 16.033 for any

registrant who has not submitted an application that contains a "YES" answer to the citizenship question.

- 4. Review all previously filed applications of registered voters, or permit the Foundation to review them, and initiate challenge or investigation procedures under Texas Election Code Sections 13.074 or 16.033 for any registrant who has submitted an application that contains a "NO" answer to the citizenship question.
- 5. Report findings of any such review to this Court and to the Secretary of State of Texas.

Dated: October 9, 2020.

Respectfully submitted,

/s/ Andy Taylor

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Counsel for Relators

RULE 52.3(J) CERTIFICATION

I have reviewed the petition and concluded that every factual statement in the petition is supported by competent evidence in the appendix or record.

/s/ Andy Taylor
Andy Taylor

CERTIFICATE OF SERVICE

I certify that, because of the imminent nature of this proceeding, copies of the foregoing were served in electronic form at the same time the foregoing document was filed with the Court to the counsel below.

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Dated: October 9, 2020

/s/ Andy Taylor
Andy Taylor

CERTIFICATE OF COMPLIANCE

This brief complies with the type-volume limitation of Tex. R. App. P. 9(i)(2)(D) because it contains 4,483 words, excluding the parts of the petition exempted by Tex. R. App. P. 9.4(i)(1).

This brief also complies with the typeface requirements of Tex. R. App. P. 9.4(e) because it has been prepared in a proportionally spaced typeface in 14-point font.

/s/ Andy Taylor
Andy Taylor

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IN THE SUPREME COURT OF TEXAS

In re JUAN GERARDO PEREZ PICHARDO AND PUBLIC INTEREST LEGAL FOUNDATION, INC.

Relators

Ann Harris Bennett, in her official capacity as Voter Registrar for Harris County, Texas, Respondent

APPENDIX

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*Application for pro hac admission forthcoming

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IN THE SUPREME COURT OF TEXAS

In re JUAN GERARDO PEREZ PICHARDO AND PUBLIC INTEREST LEGAL FOUNDATION, INC.

Relators

Ann Harris Bennett, in her official capacity as Voter Registrar for Harris County, Texas, Respondent

AFFIDAVIT OF LOGAN CHURCHWELL IN SUPPORT OF PETITION FOR WRIT OF MANDAMUS

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*Application for pro hac admission forthcoming

State of Oklahoma §

§

County of Oklahoma §

BEFORE ME, the undersigned personally appeared Logan Churchwell who, swore the following:

- 1. My name is Logan Churchwell. I am over 18 years of age, of sound mind, and competent to make this affidavit. I have personal knowledge of the facts stated herein, and they are true and correct to the best of my knowledge.
 - 2. I am resident of Oklahoma.
- 3. I am Communications and Research Director for Public Interest Legal Foundation, Inc.
- 4. The Public Interest Legal Foundation, Inc. (the "Foundation") is a non-partisan, public interest organization incorporated and based in Indianapolis, Indiana. The Foundation's mission is to promote the integrity of elections nationwide through research, education, remedial programs, and litigation. The Foundation also seeks to ensure that voter qualification laws and election administration procedures are followed. Specifically, the Foundation seeks to ensure that the nation's voter rolls are accurate and current, working with election administrators nationwide and educating the public about the same. As an integral part of its public interest mission, the Foundation gathers and disseminates information about compliance by state and local election officials with voter list maintenance laws. The Foundation relies on state and federal open records laws to

assess the accuracy of voter registration records and compliance with voter list maintenance laws.

- 5. In December 2017, the Foundation submitted a request to Ann Harris Bennett, Voter Registrar for Harris County, Texas ("Registrar Bennett") asking to inspect or receive copies of records concerning Registrar Bennett's programs and activities conducted for the purpose of ensuring the accuracy of the voter roll. The request was made pursuant to the open records provision of the National Voter Registration Act of 1993 ("NVRA"). 52 U.S.C. § 20507(i). Registrar Bennett did not provide access to the requested records and the Foundation thereafter filed an action in federal court to compel Registrar Bennett's compliance with the NVRA. *Public Interest Legal Foundation v. Bennett*, No. 4:18-cv-00981 (S.D. Tex., filed March 29, 2018).
- 6. More than two years after the request for records was made—and after her motion to dismiss was denied Registrar Bennett agreed to resolve the dispute through a court-ordered settlement. On March 17, 2020, the court entered the Agreed Order, which obligates Registrar Bennett to provide to the Foundation seven years of voter list maintenance records. See Doc. 76, Public Interest Legal Foundation v. Bennett, No. 4:18-cv-00981 (S.D. Tex., filed March 13, 2020).

¹¹ Public Interest Legal Found. v. Bennett, No. 4:18-CV-00981, 2019 U.S. Dist. LEXIS 38686 (S.D. Tex. Mar. 11, 2019), adopting recommendation of Public Interest Legal Found. v. Bennett, No. H-18-0981, 2019 U.S. Dist. LEXIS 39723 (S.D. Tex. Feb. 6, 2019).

Attachment A to this affidavit is a true and correct copy of the Agreed Order. The Agreed Order obligated Registrar Bennett to produce the records within ninety days of entry of the order—or by June 15, 2020. However, Registrar Bennett began producing records on a rolling basis on June 22, 2020. As of the date of the Foundation's petition, the Foundation has not yet received all records to which it is entitled under the terms of the Agreed Order.

- 7. The Foundation incurred substantial costs of time and money obtaining Registrar Bennett's voter list maintenance records. After entry of the Agreed Order, the Foundation moved for an award of attorneys fees, costs, and expenses reasonably expended in the litigation in an amount totaling more than \$210,000. Doc. 85, *Public Interest Legal Foundation v. Bennett*, No. 4:18-cv-00981 (S.D. Tex., filed March 13, 2020). The motion is pending. The Foundation has incurred additional costs of time and money reviewing and cataloging the records and analyzing Registrar Bennett's compliance with state and federal voter list maintenance laws. If this petition is not granted, the Foundation will likely be forced to divert additional resources to Harris County and incur additional costs to continue to engage in similar record gathering and monitoring activities, as well as the promotion of remedial measures.
- 8. Attachments B and C to this affidavit contain true and correct copies of voter list maintenance records produced to the Foundation by Registrar Bennett

in compliance with the Agreed Order entered in *Public Interest Legal Foundation v. Bennett*, No. 4:18-cv-00981 (S.D. Tex., filed March 29, 2018).

- 9. Attachment B contains true and correct copies of voter list maintenance records relating to applicants who answered "NO" to the question "Are you a United States citizen?" on the voter registration form. According to Registrar Bennett's records, each of these applicants was registered to vote anyway. It is my understanding that each of these registrants was removed from the voter roll after making a subsequent attestation of non-citizenship.
- 10. Attachment C to this affidavit contains true and correct copies of voter list maintenance records relating to applicants who did not answer the question "Are you a United States citizen?" on the voter registration form.

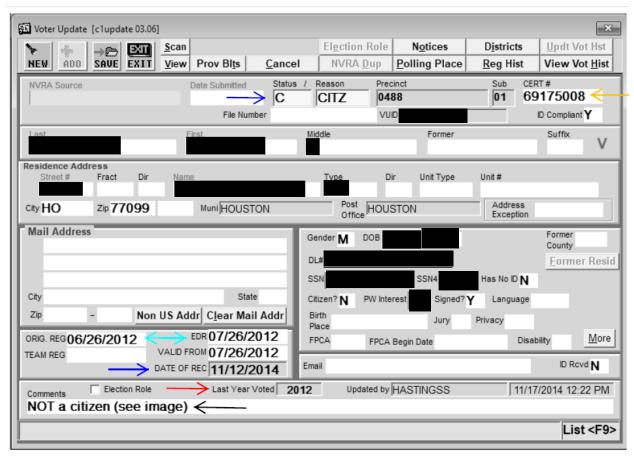
 According to Registrar Bennett's records, each of these applicants was registered to vote anyway. It is my understanding that each of these registrants was removed from the voter roll after making a subsequent attestation of non-citizenship.
- 11. The following is a representative example of the records contained in Attachments B and C to this Affidavit. The first image below shows the application for voter registration. The red arrows show that the applicant answered "NO" to the question "Are you a United States Citizen?" The green arrows show that the applicant noted on his form that he was a "legal" resident and "not yet" a

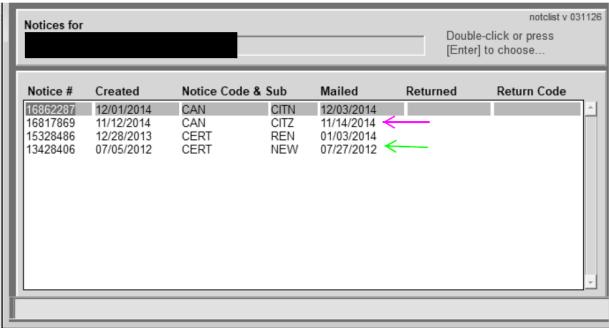
United States citizen. The blue arrows provide the date the application was completed, June 12, 2012. 12

¹² The records included with this petition came to the Foundation with certain information redacted, such as driver's license and social security numbers. The Foundation has further redacted name, address, birth date, signature information.

These Questions Must Be Complete	300935022		—
New Application Change of Address, Name, or Other Information	Request	for a Replaceme	ent Card
you a United States Citizen?	☐ Yes	→ 🛭 N	lo
l you be 18 years of age on or before election day?	(XI) Yes	N	lo
you checked 'No' in response to either of the abo	ve, do <u>not comple</u>	te this form.	
you interested in serving as an election worker?			
Last Name Include Suffix Henry First Name	Middle Name	Former Nar	ne (1 arry)
(Jr. Sr. 11)	(if any)		
Residence Address: Street Address and Apartment Number.		TEXA	18
none, describe where you live. (Do not lealude P.O. Box, Runal Rt. or Susine Address)	HOUSION	Zip Cod	
	County Harris	7709	
Mailing Address: Street Address and Apartment Number. (If mail cannot be delivered to your residence address.)	City	State	
S AME ABOUG		Zip Cod	de
Date of Birth: (mm/dd/vvvv) Gegder (Opti	onal) 7 Telephone Include Area	Number (Optional Code	onel)
	fexas Driver's License		
gree	ast 4 digits of you <u>r Soc</u> XXX-XX-	ial Security Nun	iber
I have not been issued a Texas Driver's Licen	se/Personal Identific	ation Number	or
Social Security Number.			
I understand that giving false information to procure a vote state and federal law. Conviction of this crime may result in	registration is perjur	y, and a crime u	inder
\$2,000, or both. Please read all three statements to affirm be	efore signing.	160 days, a nine	up to
I am a relicent of this county and a file ticket 100 - 7 I have not been finally convicted of a felony, or if a felon, in	at Completed all of m	ry nunishment	
including any term of incarceration, parole, supervision, pardoned; and	period of probation,	or I have been	
 I have not been determined by a final judgment of a cou- be totally mentally incapacitated or partially mentally inc 	rt exercising probate	jurisdiction to	
be totally included including including including including	· _	_	
V	Date 06	11241	<u>a</u>
Χ		Claused by William	ss and Date
p to Applicant or Print	led Name of Applicant If	agree by men	se and Date.

The second image shows a screen capture of the Texas voter registration system. The light blue arrows show two things: the original date of registration of June 26, 2012 ("ORIG. REG") and the effective date of registration of July 26, 2012 ("EDR"). The light green arrow shows that a new registration certificate ("CERT" "NEW") was created for this applicant on July 5, 2012 and mailed out on July 27, 2012. The red arrow shows that the applicant was credited with voting in 2012 ("Last Year Voted"). The two dark blue arrows show that the registration was cancelled ("Status" "C"), the reason for cancellation ("CITZ" or citizenship), and the date the registration was effectively cancelled ("DATE OF REC"). The pink arrow repeats this information and shows further that the registrant received a cancellation letter on November 14, 2014. The black arrow shows comments made by the user. In this instance, the comment reads "NOT a citizen (see image)."





- 12. Attachment B to this Affidavit contains forty-nine (49) examples of similar records that contain a "NO" answer to the citizenship question.
- 13. The Appendix to this petition also contains true and correct copies of Registrar Bennett's voter list maintenance records relating to applicants who did not answer the citizenship question on the voter registration form but were nevertheless added to the official list of eligible voters. Each registrant was later removed from the voter roll after the registrant made a subsequent attestation of non-citizenship. Attachment C to this Affidavit contains six examples of this type of record, each of which is summarized in Attachment D to this Affidavit.
- 14. Attachment D to this affidavit contains a summary of certain information contained in the records contained in Attachments B and C. The summary identifies each record using the CERT #, which is found next to the orange arrow in image two, above.

SIGNED this 25,4 day of September 2020.

Logan Churchwell

SUBSCRIBED and SWORN TO before me, the undersigned authority, on the 25 day of September 2020.

1903731 W

Notary in and for the State of Oklahoma

United States District Court
Southern District of Texas

ENTERED

March 17, 2020 David J. Bradley, Clerk

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

PUBLIC INTEREST LEGAL FOUNDATION,)
Plaintiff,)
v.	Civil Action No. 4:18-cv-00981
ANN HARRIS BENNETT, in her official capacity as voter registrar for Harris County, Texas,)))
Defendant.))

AGREED ORDER

Upon consideration of the Motion for Entry of Agreed Order filed by the parties to this action, it is hereby ORDERED, ADJUDGED, and DECREED as following:

I. BACKGROUND

- 1. On March 29, 2018, Plaintiff Public Interest Legal Foundation filed this action pursuant to the National Voter Registration Act of 1993 ("NVRA"), 52 U.S.C. §§ 20501 *et seq*. for alleged violations of Section 8 of the NVRA, 52 U.S.C. § 20507.
 - 2. Section 8(i) of the NVRA provides, in relevant part,

Each State shall maintain for at least 2 years and shall make available for public inspection and, where available, photocopying at a reasonable cost, all records concerning the implementation of programs and activities conducted for the purpose of ensuring the accuracy and currency of official lists of eligible voters, except to the extent that such records relate to a declination to register to vote or to the identity of a voter registration agency through which any particular voter is registered.

52 U.S.C. § 20507(i)(1).

- 3. Plaintiff is seeking from Defendant the following records:
- a. Documents regarding all registrants who were identified as potentially not satisfying the citizenship requirements for registration from any official information source,

including information obtained from the various agencies within the U.S. Department of Homeland Security, Texas Department of Public Safety, and from the Texas Secretary of State since January 1, 2006. This request extends to all documents that provide the name of the registrant, the voting history of such registrant, the nature and content of any notice sent to the registrant, including the date of the notice, the response (if any) of the registrant, and actions taken regarding the registrant's registration (if any) and the date of the action. This request extends to electronic records capable of compilation.

- b. All documents and records of communication received by your office from registered voters, legal counsel, claimed relatives, or other agents since January 1, 2006 requesting a removal or cancellation from the voter roll for any reason related to non-U.S. citizenship/ineligibility. Please include any official records indicating maintenance actions undertaken thereafter.
- c. All documents and records of communication received by your office from jury selection officials—state and federal—since January 1, 2006 referencing individuals who claimed to be non-U.S. citizens when attempting to avoid serving a duty call. This request seeks copies of the official referrals and documents indicating where your office matched a claim of noncitizenship to an existing registered voter and extends to the communications and maintenance actions taken as a result that were memorialized in any written form.
- d. All communications regarding your list maintenance activities relating to #1 through 3 above to the District Attorney, Texas Attorney General, Texas State Troopers/DPS, any other state law enforcement agencies, the United States Attorney's office, or the Federal Bureau of Investigation.
- 4. The parties have negotiated in good faith and now jointly enter into this Agreed Order to resolve Plaintiff's claims without prolonged and costly litigation.

II. JURISDICTION

5. This Court has jurisdiction over this matter, pursuant to 28 U.S.C. § 1331 and 52 U.S.C. § 20510.

III. APPLICABILITY

- 6. The provisions of this Agreed Order shall apply to and bind the parties and their successors and assigns.
 - 7. This Agreed Order is effective as of the date it is entered by this Court.

IV. TERMS AND CONDITIONS

Lists, Reports, and Catalogs of Registrants Cancelled Due to Non-U.S. Citizenship

- 8. Defendant shall provide to Plaintiff all lists, reports, and catalogs of occurrences showing registrants whose voter registrations were cancelled because the registrant did not satisfy the citizenship requirements for voter registration.
- 9. The lists, reports, and catalogs described in paragraph 9 shall include, but are not limited to:
 - a. Registrants whose voter registration records contain the cancellation code (or
 other notation) used to indicate that the registration was cancelled due to non-U.S.
 citizenship; and
 - b. Registrants who requested cancellation of their voter registrations due to non-U.S. citizenship.

Lists, Reports, and Catalogs of Registrants Who Were Sent a "Notice of Examination"

- 10. Defendant shall provide to Plaintiff all lists, reports, and catalogs of occurrences showing registrants who, for reasons relating to the citizenship of the registrant, received a "Notice of Examination," the notice described by Texas Election Code § 16.033 or § 16.0332, or any other similar notice.
- 11. The lists, reports, and catalogs described in paragraph 11 shall include, but are not limited to, registrants whose voter registration records contain the notation "con-exam."

Lists, Reports, and Catalogs of Applicants or Registrants Who Answered "No" to the Citizenship Question on the Voter Registration Form or Left the Question Blank

12. Defendant shall provide to Plaintiff all lists, reports, and catalogs of occurrences showing registrants who answered "No" to the citizenship question on the voter registration form or left the question blank.

List of Registrants Disqualified from Jury Service Due to Citizenship Defects

13. Separately and apart from the lists and reports described in paragraph 9,

Defendants shall provide to Plaintiff all lists and reports showing registrants disqualified from

jury service due to non-U.S. citizenship. These reports shall include the lists described in Texas

Government Code § 62.113, Texas Election Code § 16.0332, and Texas Election Code § 18.068.

Records of Voter Registration Activities, Correspondence, and Applications

- 14. For each registrant included in the lists, reports, and catalogs described in paragraphs 8-13, Defendant shall provide the following:
 - a. A summary of voter registration activities, including but not limited to a copy of the registrant's "Voter Update" page, or a similar record that shows a summary or history of the registrant's voter registration activities;
 - b. All documents associated with the registrant, including but not limited to a copy of the registrant's original voter registration application and any subsequent voter registration applications submitted by the registrant, and any correspondence sent to or received from the registrant.

Communications with Law Enforcement

Defendant shall provide to Plaintiff records of all correspondence between Defendant and any law enforcement body, including, but not limited to, the Harris County District Attorney, concerning registrants whose registrations were cancelled due to non-U.S. citizenship. These records shall include, to the extent they are still in Defendant's possession, the correspondence referenced by former Harris County Tax Assessor-Collector Mike Sullivan in his testimony before the Texas House Elections Committee on May 2, 2015.

Time Period for the Records

16. Defendant shall provide the records described in this Agreed Order for the time period starting on January 1, 2013 and ending on the date this Agreed Order is entered by this Court.

Time to Produce the Records

17. Defendant shall provide the records described in this Agreed Order to Plaintiff within 90 days of the date this Agreed Order is entered by this Court.

Permissible Redactions

- 18. Defendants may redact the following information on the records described in this Agreed Order:
 - a. The registrant's driver's license number;
 - b. The registrant's social security number;
 - c. The registrant's telephone number; and,
 - d. The registrant's response to the question regarding service as a poll worker.

V. RETENTION OF JURISDICTION AND DISPUTE RESOLUTION

- 19. This Court retains jurisdiction over this action for purposes of the following:
 - a. Implementing and enforcing the terms and conditions of this Agreed Order;
 - b. Resolving disputes involving this Agreed Order; and,
 - c. Adjudicating any motion for attorney's fees, costs, and expenses filed pursuant to
 52 U.S.C. § 20510(c).
- 20. This case may be reopened without a filing fee so that the parties may enforce this Agreed Order or resolve disputes regarding its terms and conditions.

- 21. In the event of a dispute regarding compliance with this Agreed Order, the parties must first attempt to resolve the dispute by meeting or by using other means of communication to discuss the dispute and the measures for resolving the dispute. If no resolution is reached within 30 days of the first communication regarding the dispute, either party may file a motion with this Court to resolve the dispute.
- 22. The provisions of 52 U.S.C. § 20510(c), regarding an award of attorney's fees, costs, and expenses to the prevailing party, if any, shall apply to any proceeding to enforce the terms and conditions of this Agreed Order.
- 23. This Agreed Order may be modified only upon motion and the approval of this Court.
- 24. If for any reason this Court should decline to approve this Agreed Order in the form presented, the parties shall continue negotiations in good faith in an attempt to cure any objection raised by this Court to entry of this Agreed Order.

VI. ATTORNEY'S FEES AND COSTS

- 25. Each of the parties consents to allow this Court to determine at a later time whether Plaintiff, Defendant, or neither party is a prevailing party in this action for purposes of 52 U.S.C. § 20510(c).
- 26. Upon entry of this Agreed Order by this Court, Plaintiff and/or Defendant may file a motion for attorney's fees, costs, and expenses.

VII. FUTURE REQUESTS FOR RECORDS UNDER NVRA

27. In the event Plaintiff makes additional requests under Section 8(i) of the NVRA for records described by this Agreed Order and covering time periods after the effective date of this Agreed Order, Defendant shall permit Plaintiff to inspect or receive the requested records in

the same categories as listed in Section IV, numbers 8-16, with redactions as listed in Section IV, number 18, subsections a-d.

VIII. RESOLUTION OF ALL CLAIMS

28. This Agreed Order constitutes a full settlement of and shall resolve all civil liability of Defendant for the alleged violations of the NVRA alleged in this action, with the exception of any party's claim for attorney's fees, costs, and expenses pursuant to 52 U.S.C. § 20510(c).

IX. CONSENT TO ENTRY OF AGREED ORDER

29. Each of the parties consents to entry of this Agreed Order, subject to the Court's approval of this Order. The undersigned representatives of each party certify that they are fully authorized by the party to enter into the terms and conditions of this Order and to execute and legally bind the represented parties to it. This Order can be signed in counterparts.

	1
Judgment is hereby entered in accordance with this Agreed Order this _	17 day of
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, 2020.	

Andrew S. Hanen

United States District Judge

AGREED AND CONSENTED TO:

For Plaintiff:

Y. Christian Adams

President

Public Interest Legal Foundation, Inc. 32 E. Washington St., Ste. 1675

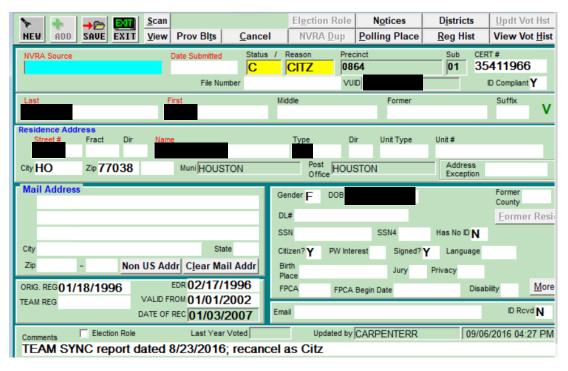
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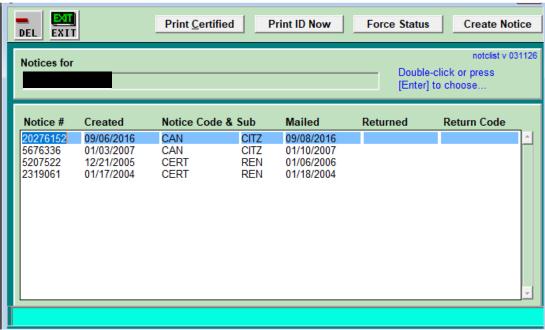
For Defendant:

Amy Magness VanHoose Assistant County Attorney 1019 Congress, 15th Floor Houston, TX 77008 Date: 3-3-2020

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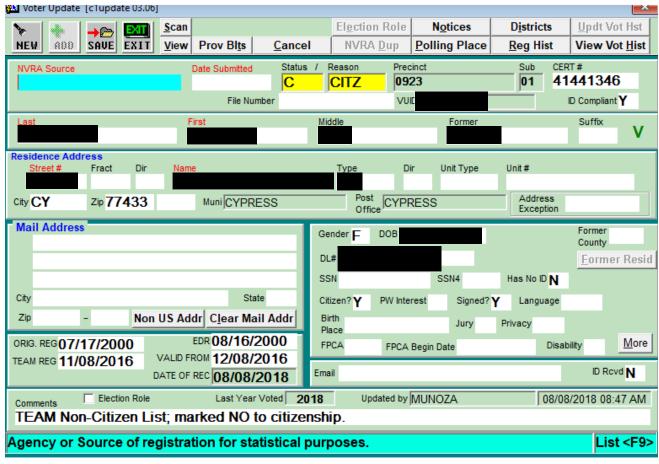


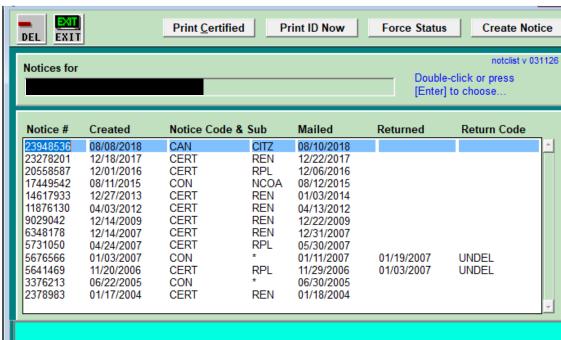


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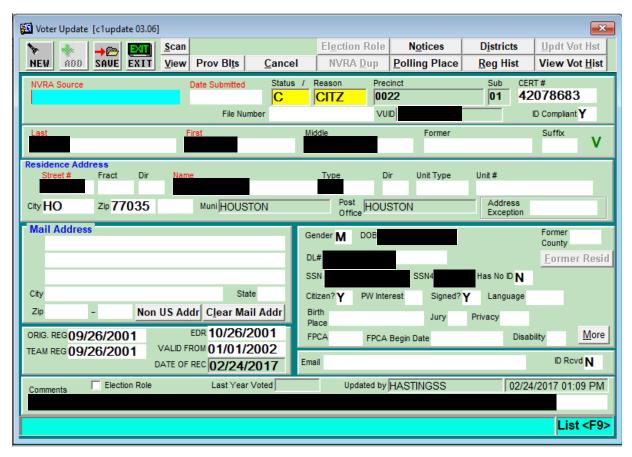
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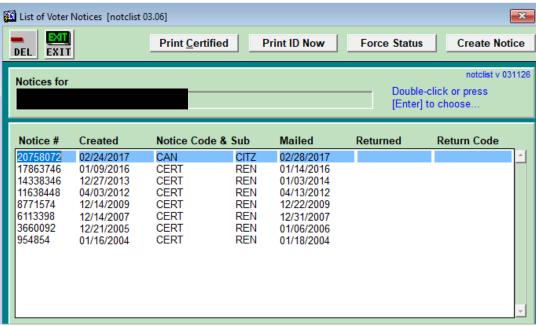
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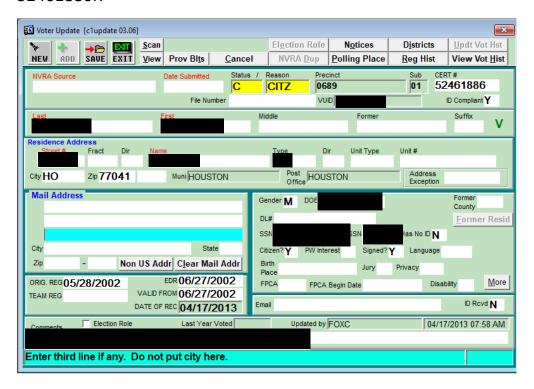
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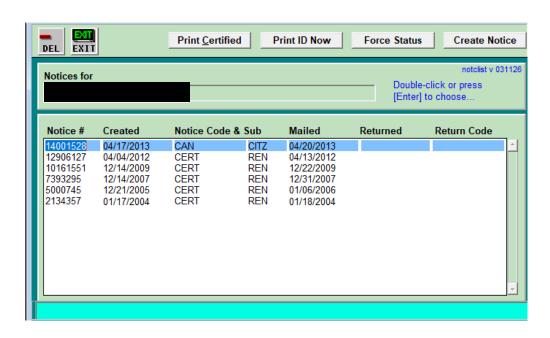


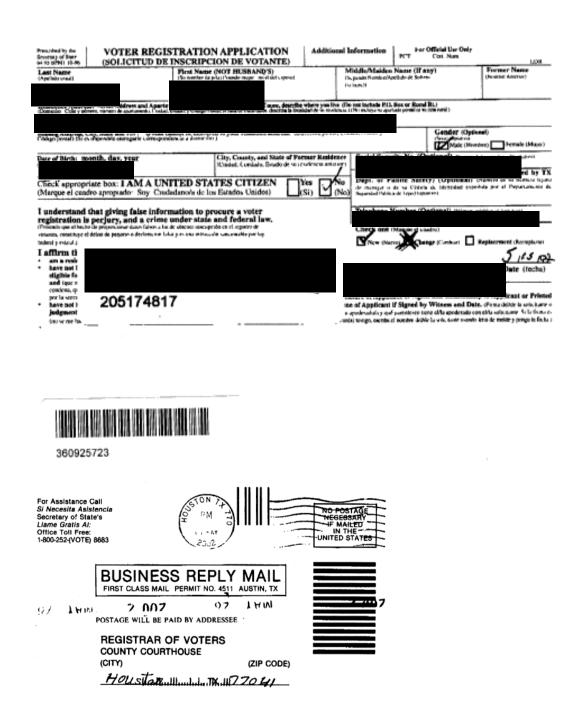


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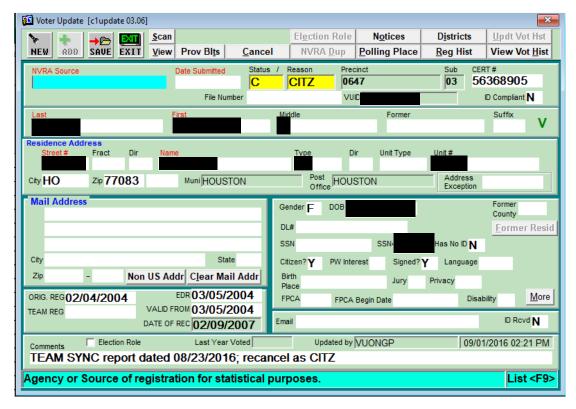
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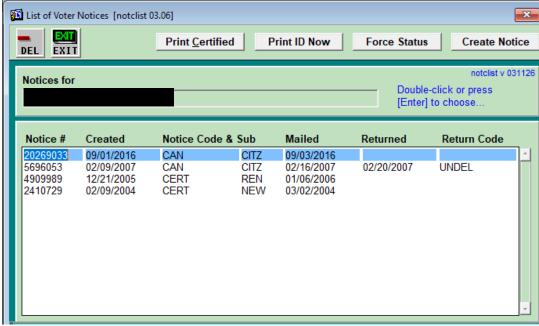




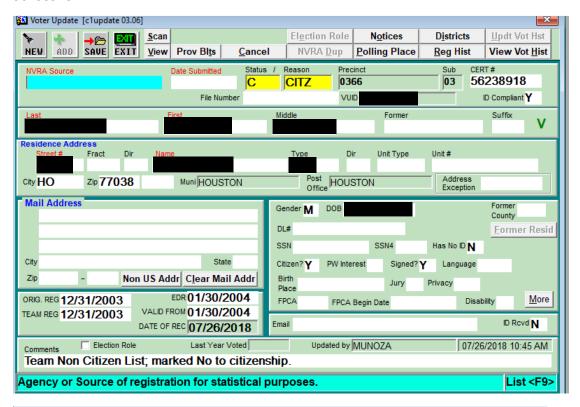


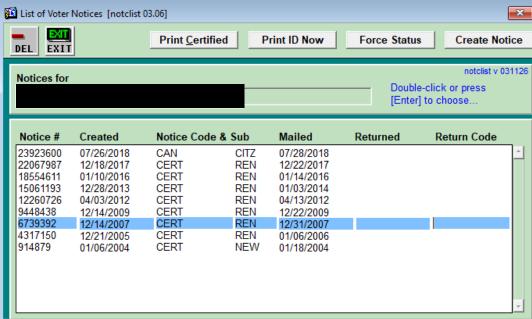
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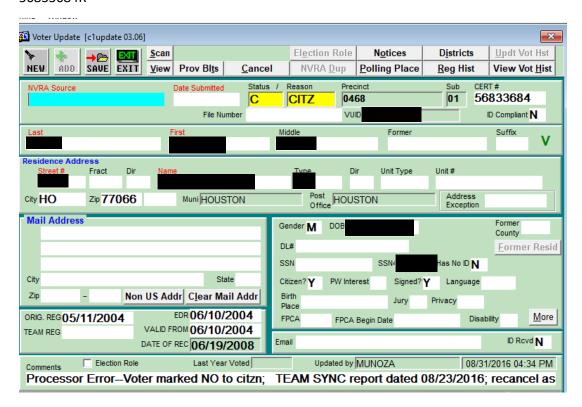


Texas Voter Registration Application www.sos.state.tx.us d by the Office of the Socretary of State Please complete sections by printing legibly. If you have any questions about how to fill out this application, please call the Secretary of State's Office toll Este formulario para inscribirse para votar tambien free at 1-800-252-VOTE(8683), TDD 1-800-735está disponible en Español. Para conseguir la version en Español favor de llamar sin cargo 1-800-252-8683 a la oficina del Secretario de Estado. Qualifications Complete These Questions · You must register to vote in the county in Before Proceeding which you reside. Check one ☐ New ☐ Change ☐ Replacement You must be a citizen of the United States. Are you a United States Citizen? ☐ Yes ☑ No You must be at least 17 years and 10 Will you be 18 years of age on or months old to register, and you must be 18 before election day? ☐ Yes ☐ No years of age by election day. If you checked 'no' in response to either of these questions, do not complete this form. You must not be finally convicted of a Have you ever voted in this county felony, or if you are a felon, you must have for a federal office? ☐ Yes ☐ No completed all of your punishment, including If you answered "no" to this question, be sure to see special any term of incarceration, parole, superviinstructions regarding identification requirements on the resion, period of probation, or you must have verse side of the application. received a pardon. Continue below to complete application. Last Name First Name Middle Name (If any) Former Name Residence Address: Street Address and Apartment Number, City, State, and ZIP. If none, describe where you live. (Do not include P.O. Box Mailing Address: Address, City, State and ZIP: If mail cannot be delivered to your residence address. Same al alsori Date of Birth: month, day, year Gender (Optional) I understand that giving false information to procure a ☐ Male ☐ Female voter registration is perjury, and a crime under state and federal law. TX Driver's License No. or Personal LD. No. I affirm that I (Issued by the Department of Public Safety) If none, give last 4 · am a resident of this county; digits of your Social Security Number have not been finally convicted of a felony or if a felon I have completed all of my punishment including any term of incarceration, parole, supervision, period of license, or personal identification number probation, or I have been pardoned; and have not been declared mentally incompetent by final Telephone Number, Include Area Code judgment of a court of law. 214120 (Optional) as above City and County of Former Residence In Texas Signature of Applicant or Agent and Kelationship to Applicant or Printed Name of Applicant if Signed by Witness and Date.





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глеаме сотпристе месцонь бу рашкинд педногу. и уом have any questions about how to fill out this application, please call the Secretary of State's Office toll free at 1-800-252-VOTE(8683), TDD 1-800-735-2989.

Qualifications

- · You must register to vote in the county in which you reside.
- · You must be a citizen of the United States.
- You must be at least 17 years and 10 months old to register, and you must be 18 years of age by election day.
- · You must not be finally convicted of a felony, or if you are a felon, you must have completed all of your punishment, including any term of incarceration, parole, supervision, period of probation, or you must have received a pardon.

Este formulario para inscribirse para votar tambien está disponible en Español. Para conseguir la version en Español favor de llamar sin cargo 1-800-252-8683 a la oficina del Secretario de Estado.

Complete These Questions Before Proceeding

Check one ☑New ☐ Change ☐ Replacement

Yes PNo Are you a United States Citizen? Yes No

Will you be 18 years of age on or before election day?

If you checked 'no' in response to either of these ques-tions, do not complete this form.

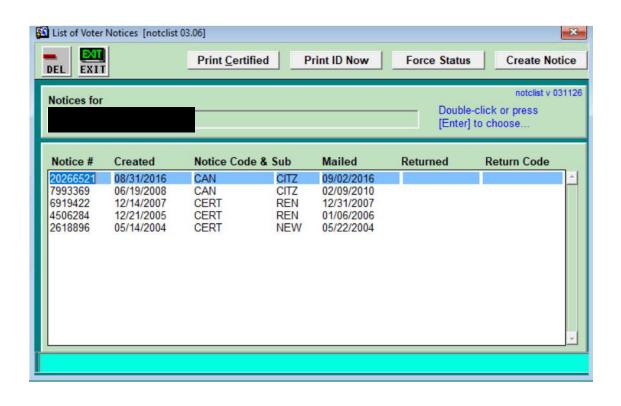
Have you ever voted in this county for a federal office?

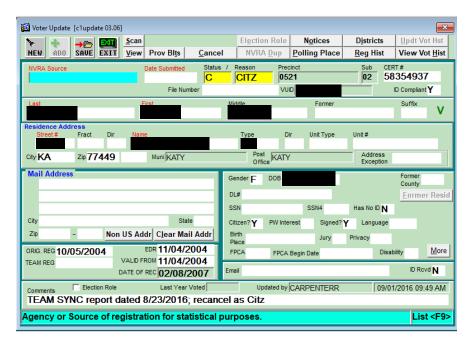
☐ Yes ☑ No

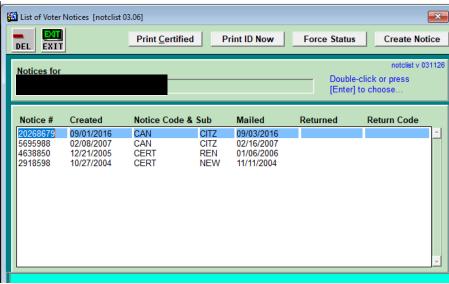
If you answered "no" to this question, be sure to see special instructions regarding identification requirements on the reverse side of the application.

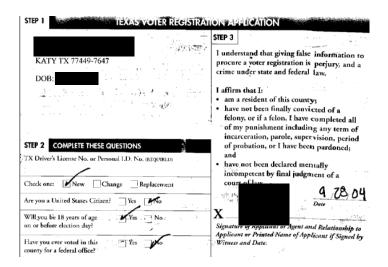
Continue below to complete application.

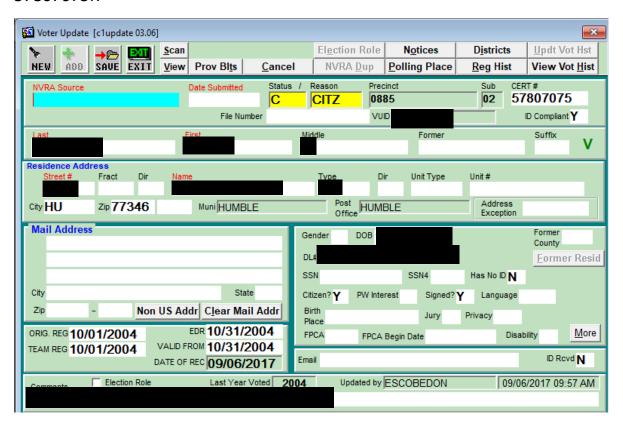
Last Name	First Name	Middle Name (f any) Former Name
Residence Address: Street Address or Rural Rt.)	ess and Apartment Number,	City, State, and ZIP. If more, describe where you live. (Do not include P.O. Box Houston, TX 77066
Mailing Address: Address, City, Date of Birth: month, day, year	State and ZIP: If mail cans Gender (Optional)	at be detivered to your residence address. I understand that giving false information to procure a
	Male □ Fem	voter registration is perjury, and a crime under state and deral law. affirm that I
☐ Check if you do not have		producti, or relave occur particular, and
Telephone Number, Include (Optional)		• have not been declared mentally incompetent by final
City and County of Former R	esidence In Texas Sig	nature of Applicant of Agent and Relationship to Applicant Printed Name of Applicant if Signed by Witness and Date.



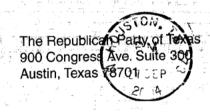








STEP 1 TEXAS VOTER REGISTRA	TION APPLICATION
HUMBLE TX 77346-3264 DOB:	I understand that giving false information to procure a voter registration is perjury, and a crime under state and federal law. I affirm that I: • am a resident of this county; • have not been finally convicted of a felony, or if a felon, I have completed all of my punishment including any term of incarceration, parole, supervision, period
STEP 2 COMPLETE THESE QUESTIONS Check one: New Change Replacement Are you a United States Citizen? Yes No Will you be 18 years of age on or before election day? Have you ever voted in this Yes No county for a federal office?	of probation, or I have been pardoned; and • have not been declared mentally incompetent by final judgment of a court of law. 9/25/04 X Sign and Relationship to Applicant or Printed Name of Applicant if Signed by Witness and Date.





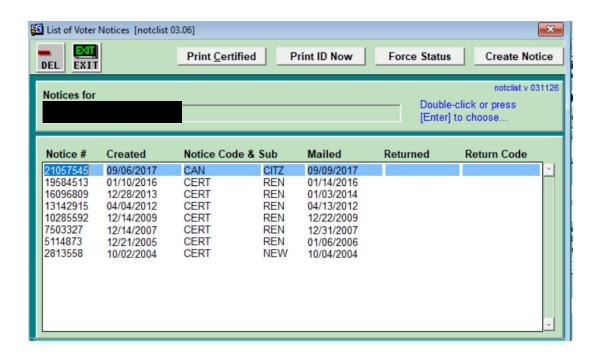
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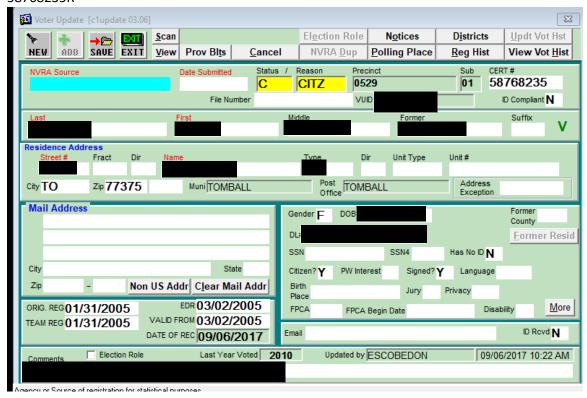


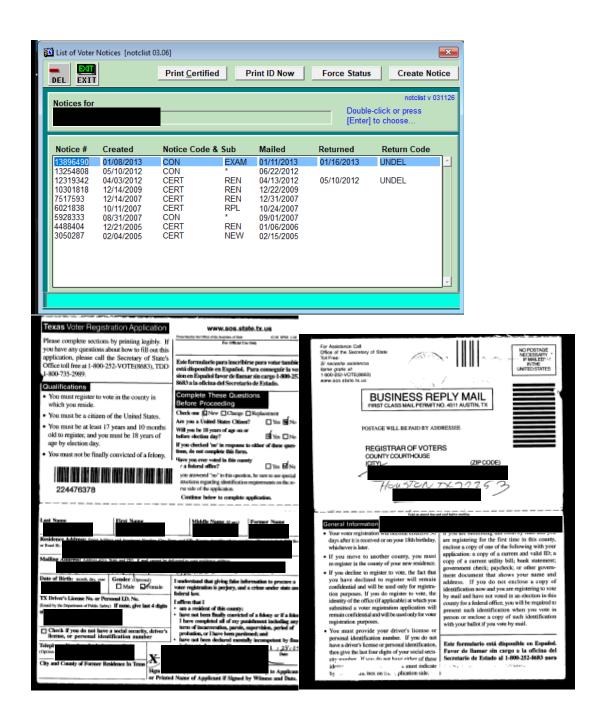
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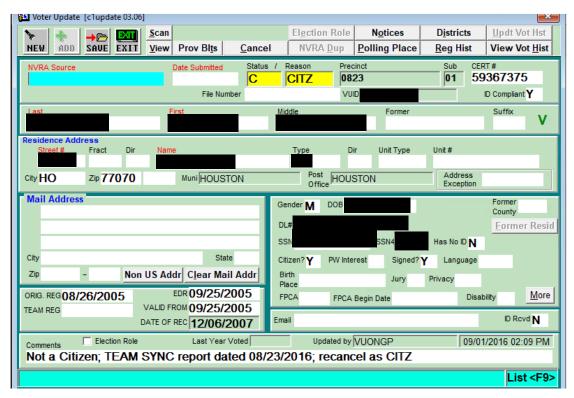
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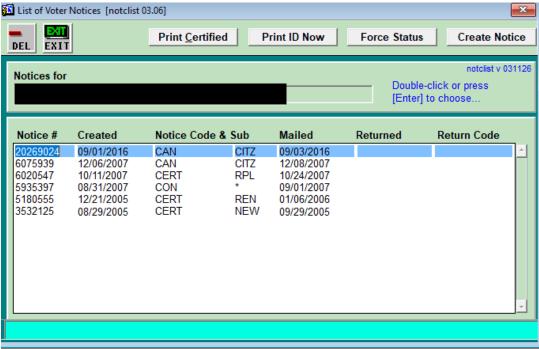






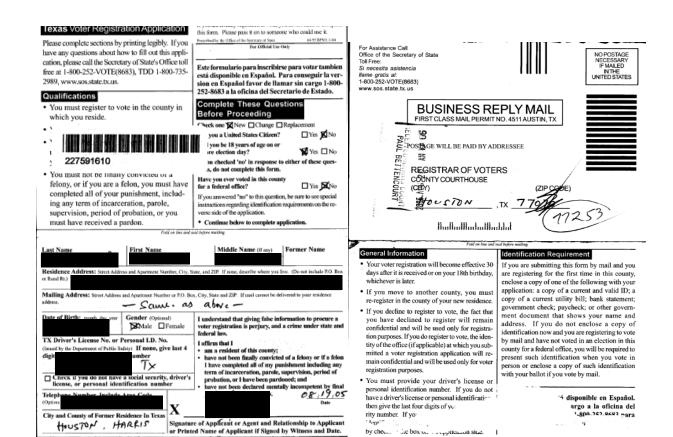
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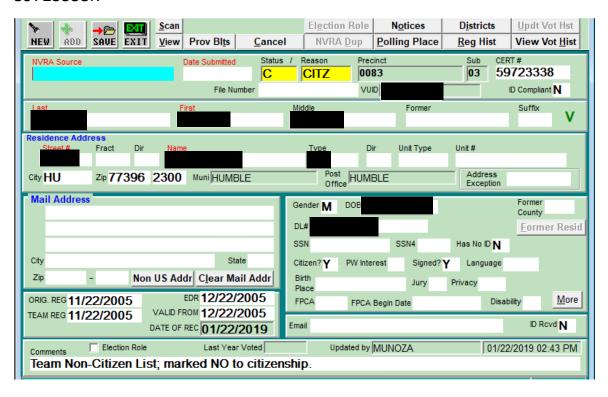


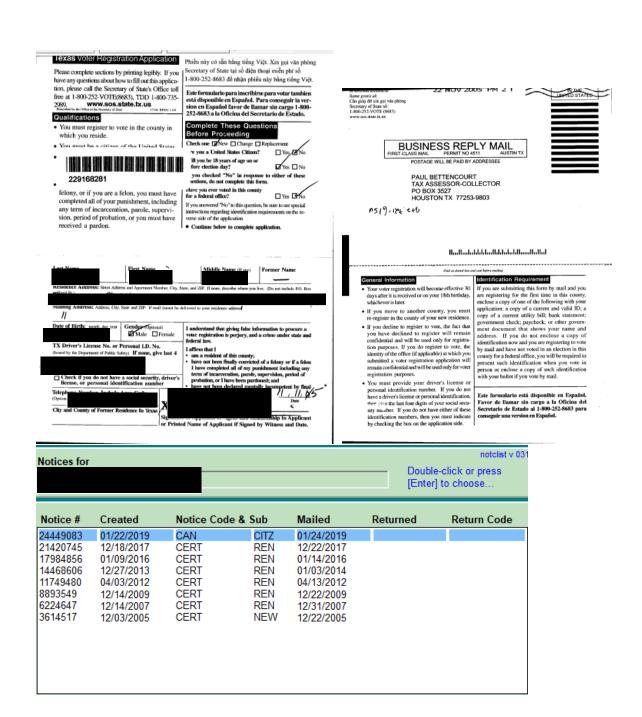
st Name	First Name	Middle Name (If any)	Former Name
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	The second control of	n residence address. Date of B	irth: month, day, year
firm the changes m	Same		
The changes in	ade are correct. 0920 07	TX Driver's License No. of (Issued by the Department of	Public Safety)
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ited Name of Vot	er if Signed by Witness and Date.	Check if you do not have personal identification n	a driver's license, or umber
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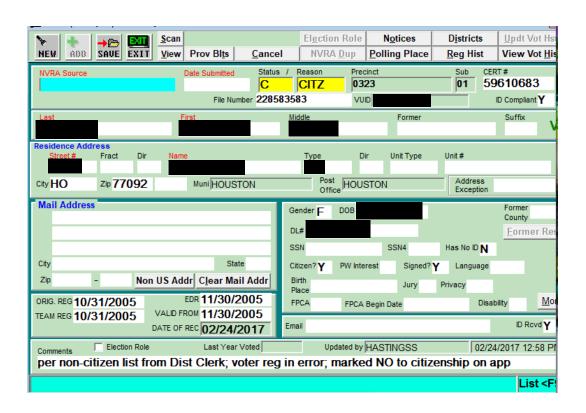
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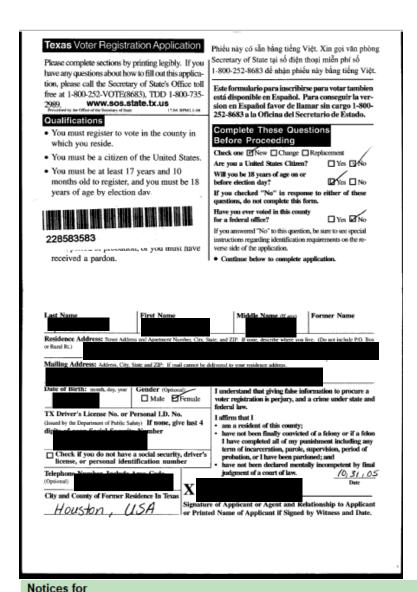


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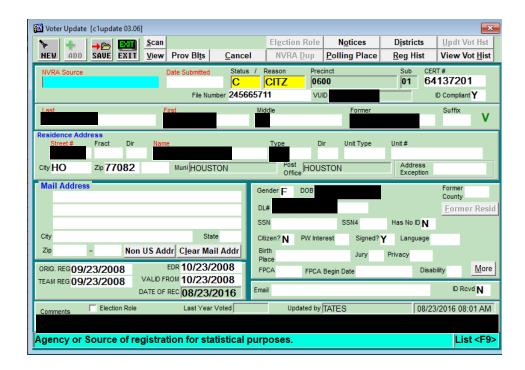


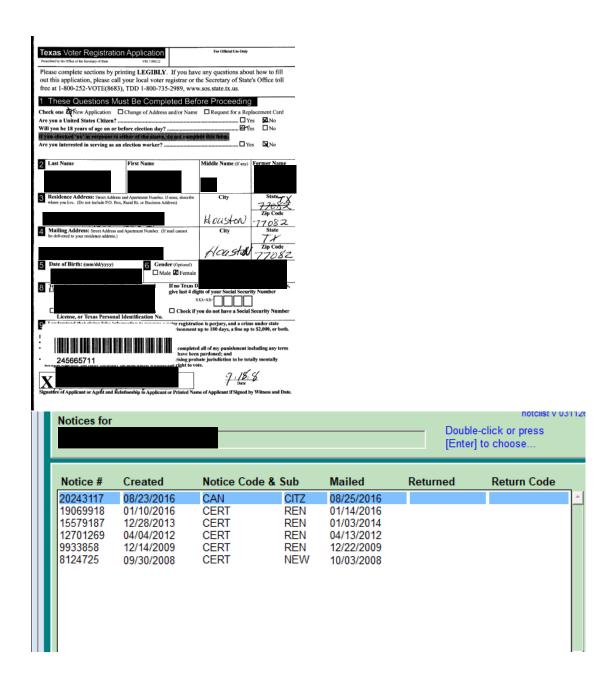


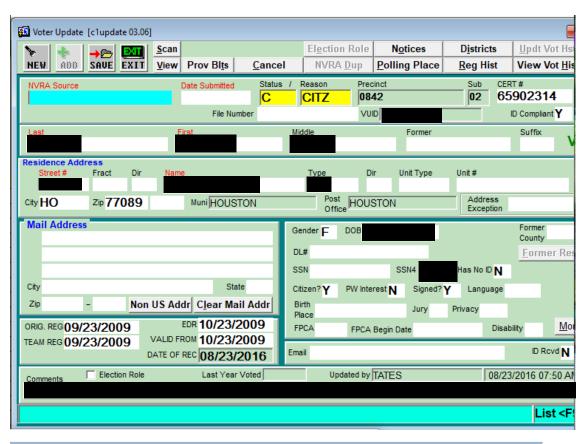


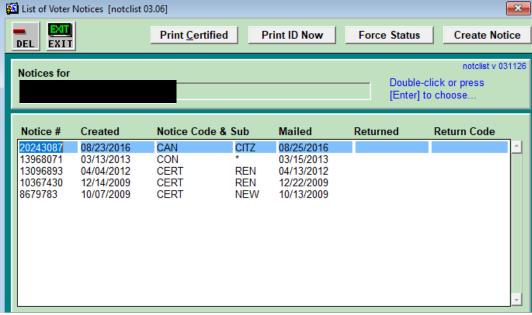
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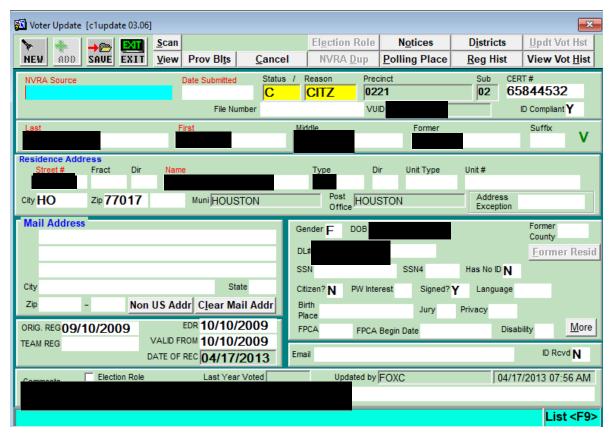


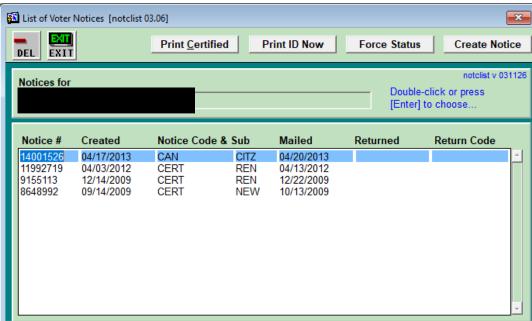


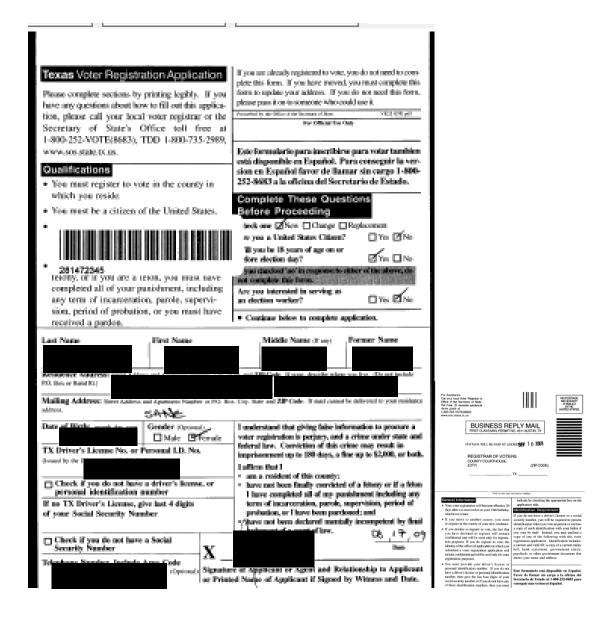


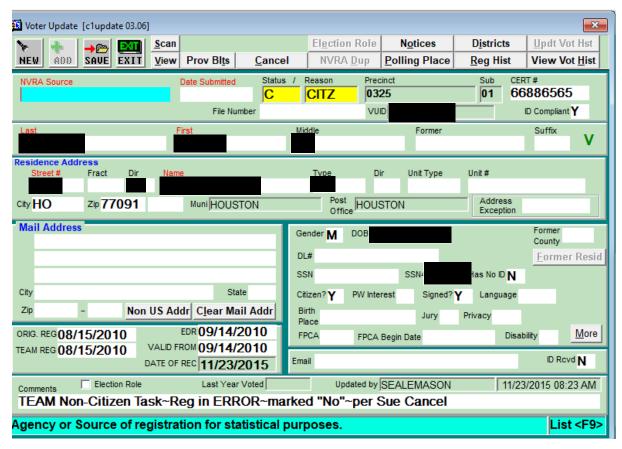


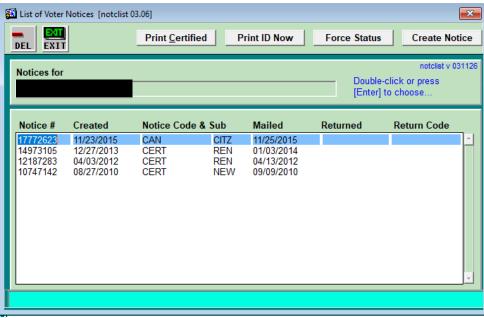
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These Questions	Must Be Complet	ted Before Procee	ding
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	D. Box, Rural Rt. or Business Addres		TX
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			17089
 Mailing Address: Street Address:	ress and Apartment Number. (If mai	•	State —
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Date of Birth: (www.kdd.yg. Texas Driver's License No. ID. No Inseed to the Forces Social Security I Lendarstand that giving falls state and federal law. Comil \$2.00, or both Prison this col - I are a real-denie of this col - I have not been finally con including any term of inc participact, and - I have not been denemin-	or Texas Personal second flatte technic second flatte	er (Optional) Fino Texas Delver's Liberard pine lest 4 digits of your So (XX-XX-) Liberard/Personal identification is perjureant in imprisonment up to differe before signing. In a court exemplated all of relation, period of probation by incapacitated without the later of Applicant it See Pressed Name of Applicant it See	e Humber (Opered) or Personal Identification. cial Security Sumber ing, and a crime under 180 days, a fine up to my purishment or I have been purisdiction to a right to vote.

For Assistance Cell Office of the Secretary of State Tot Free: Si necesite assistance Aureo grado ac Clin giúp dil xin gọi vàn phòng Secretary of State of 1-800-252-VOTE/BBID) www.non.state.ts.us

Received by Harris County Tax Office

NO POSTAGE NECESSARY F MALED IN THE UNITED STATES

AUG 1 8 2010

Voter Registration Dept.

BUSINESS REPLY MAIL FIRST CLASS MAIL PERMIT NO. 4611 AUSTIN, TX

POSTAGE WILL BE PAID BY ADDRESSEE.

LEO VASQUEZ TAX ASSESSOR-COLLECTOR AND VOTER REGISTRAR PO BOX 3527 HOUSTON, TX 77253-9803

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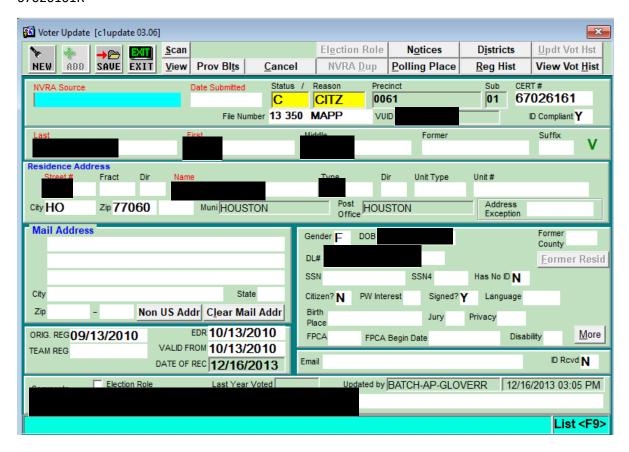
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- Yeu work be at least 17 years and 10 months old in register, and you must be 18 years of age by election dits.
- You must not be finally convicted of a fators; or flyou are infact, you must have completed all of your pusinnessed, including any term of monteration, period, supervision, period of probation, or you must have received a pactor.
- You must not have been determined by a final judgment of a court exercising probate jurisdiction to be totally mentally receipedated or perfiely mentally incorporated self-out file right to value.

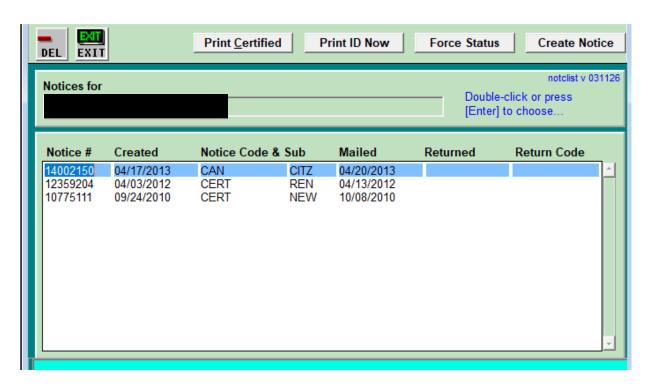
Este formulario está dispónible en Español. Favor de l'amar sin rierge a la eficira del Secretario de Estado al 1-890-252-8603 pers conseguir una version en Español.

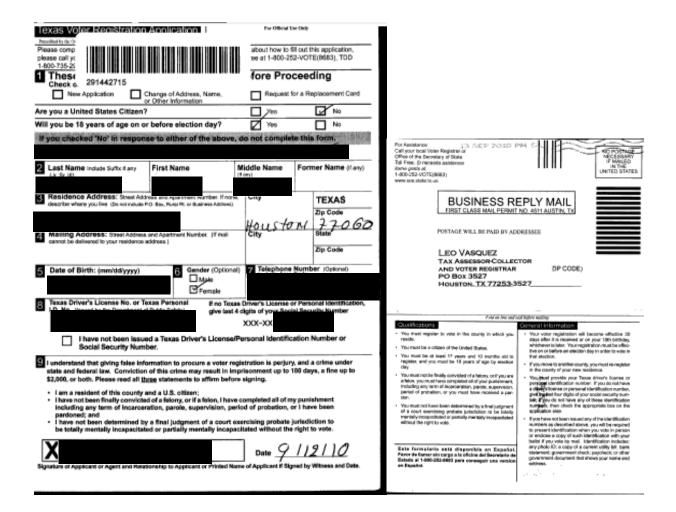
Phidu này có dàn bằng tiếng Việt. Xin gọi van phóng Secretary of State tại số điện thoại miền phi nó 1-800-252-8803 để nhận phiến tiếy bằng tiếng Việt.

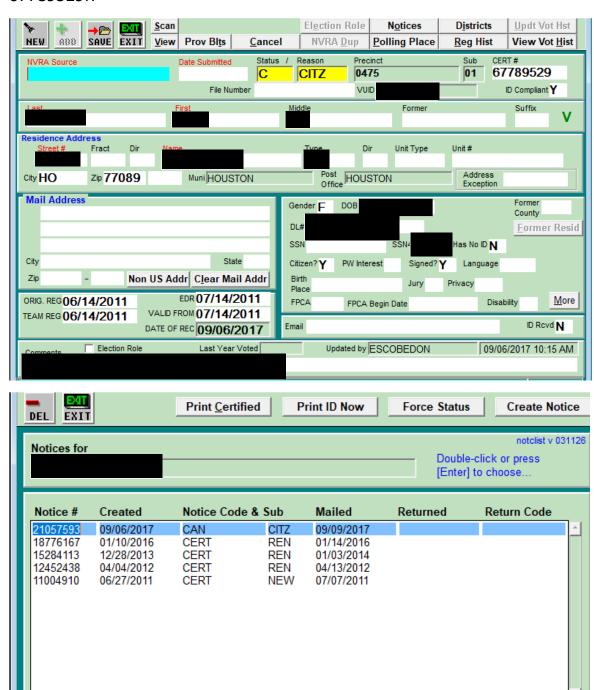
- Your voter registration will become effective 38 days after it is received or on your 16th bitfiday, which ever is later. Your registration must be effective on or before an executan day in order to vote in that election.
- If you reove to another county, you must re-righter in the causty of your new residence.
- the causity of your new testimote.
 You must provide your Testes driver's bornes or personal identification number. If you do not have a driver's license or personal identification number. If you do not have a driver's license or personal identification-number, give the last four "digits of your social security number. If you do not have any of these loserationation numbers have check the approached too or the appointers side. If you have not been issued any of the identification numbers as described above, you will be required to peased identification when you vate in person or exclose a copy of such identification with your hallow if you do not be yound. Identification with your hallow if you do not have a copy of such identification with your person in CL adopt of advanced within the label statement. On contrast that shows your name and address.

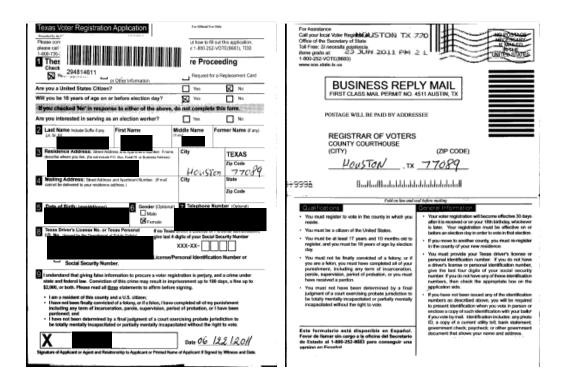
Detach the receipt below for your records. To mail: Wet the glue strip, fold in half and seal.

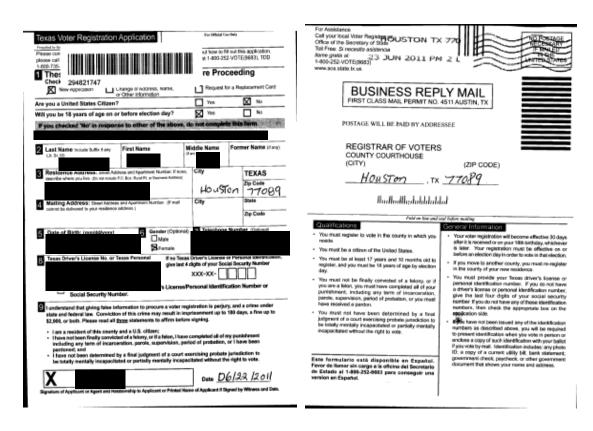




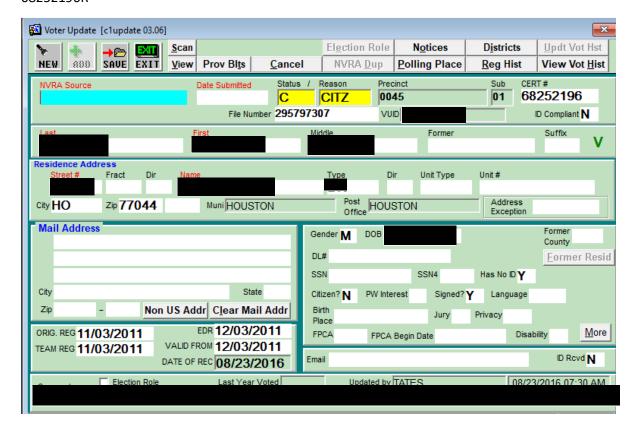


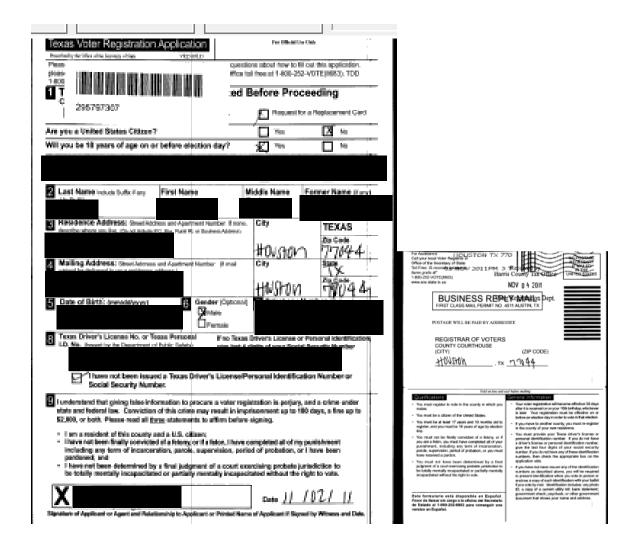


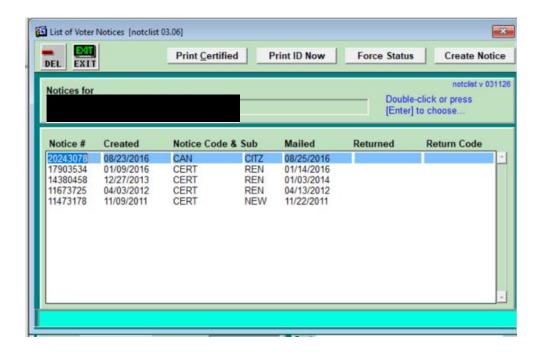




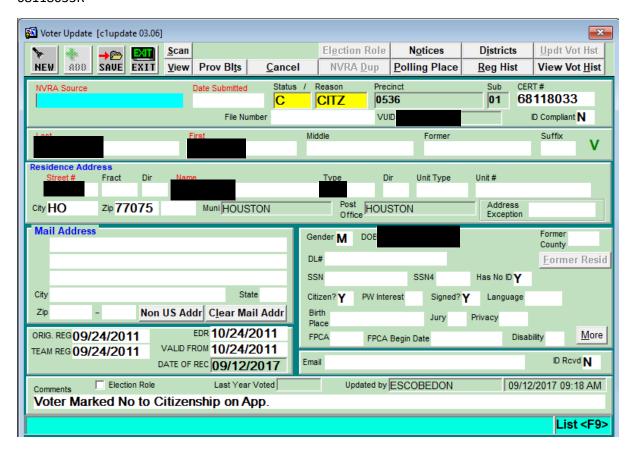


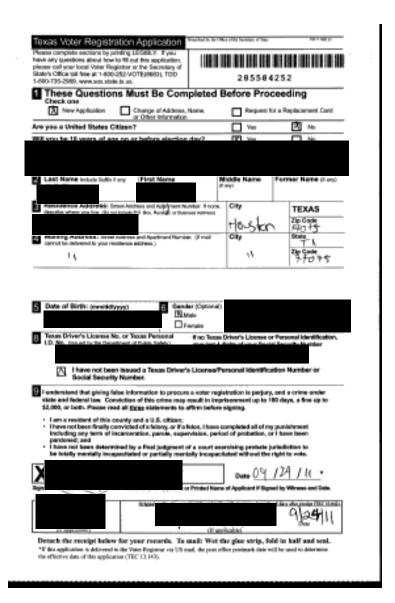






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For Assertance Call Office of the Georetary of State for Fire. Si reconstit apistences fame grafts at: Car ping 61 as got via phing. Servings of State of: 1-800-255-9070(philot) very-son, state, b. us



BUSINESS REPLY MAIL FIRST CLASS MAIL PERMIT NO. 4611 AUSTIN, TX

LEO VASQUEZ TAX ASSESSOR-COLLECTOR AND VOTER REGISTRAR PO BOX 3527 HOUSTON, TX 77253-9803

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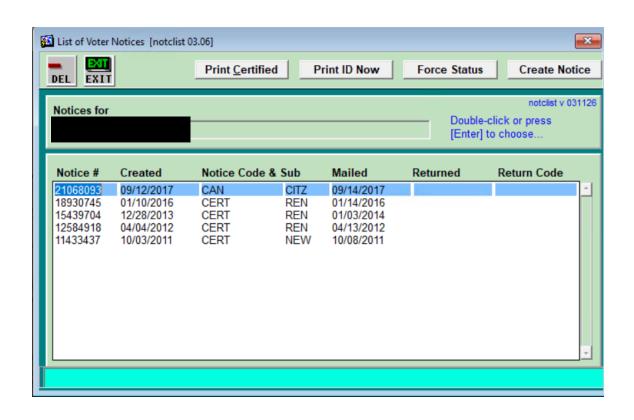
Qualifications

- You must be a sitizen of the United States.
- You result be at least 17 years and 10 moeths oil to register, and plu must be 15 years of age by election day.
- map. Yourmust notice finally convicted of a fishing, or if you want a fishing you must be excepted at all your pursuitments, including any less of incurrentation, procedul, supervision, period of protestion, or you want takes required a partial. Yourmust not because there are periodicy in a fixery purpose of a cover exercising probable principities to be below; member yourspecialised or partially executely recognished will would the right to vote.

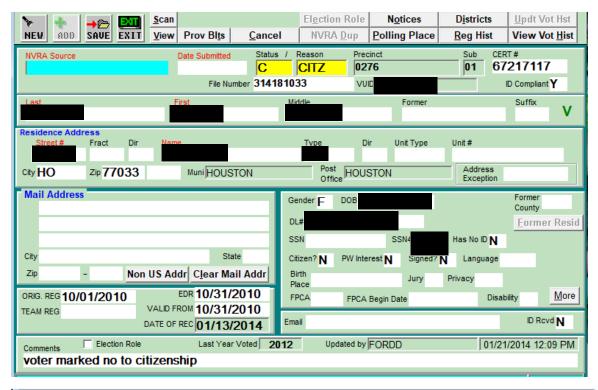
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- If you move to a rather country, you are written, if you move to a rather country, you must re-register in the county of your new residence. It was not a possible your. Team of viver's licenses or parsonal identification writers, life you do not have a diversity license or parsonal identification writers, give they let four diplies of your second security markers with you do not have any of threes identification survives, give do not have any of threes identification survives, there, thesis me appropriate not on it we application side.

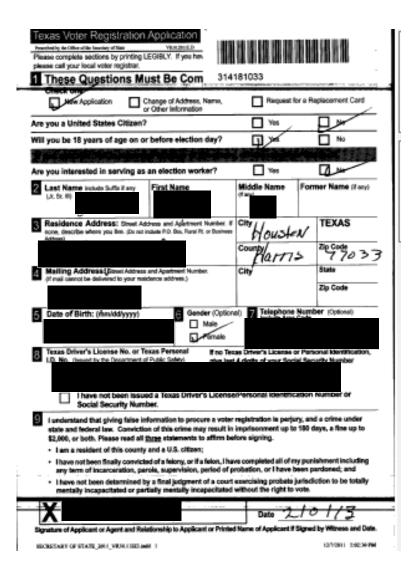
Detach the receipt below for your records. To mail: Wet the glue strip, feld in half and seal.



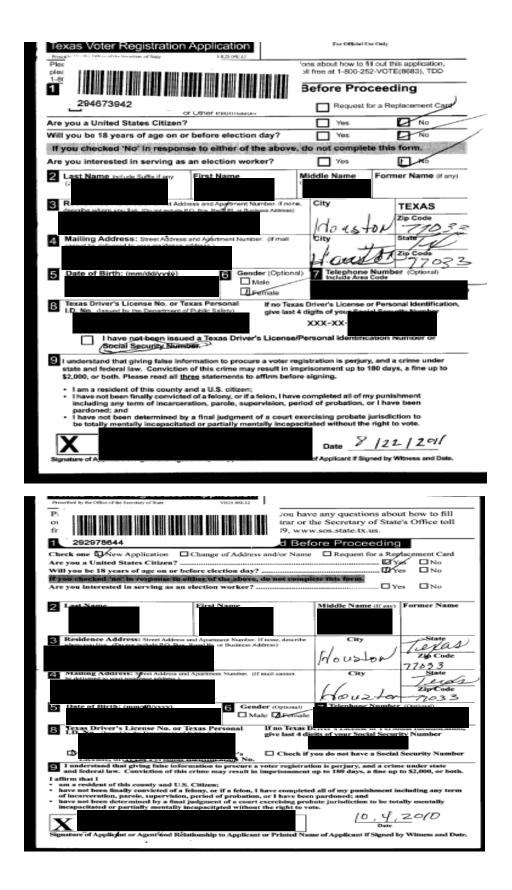
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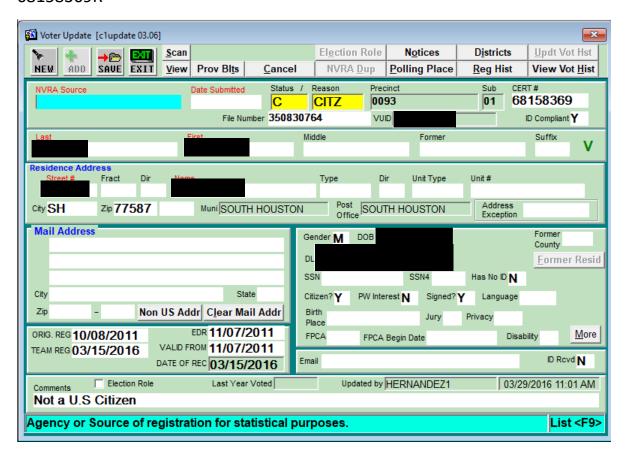


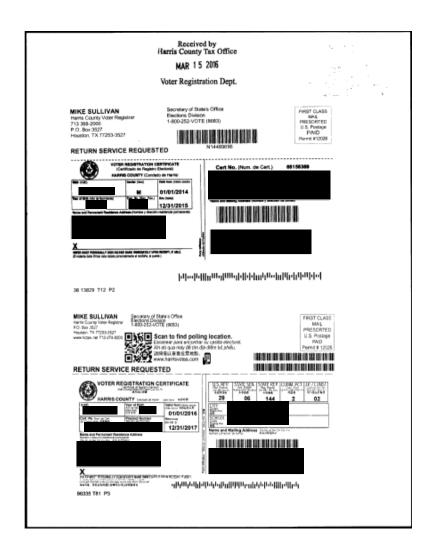


Te	xas Voter Registra	ation A	Application		For Officia	al Use Only		_
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Are	you a United States Cit	tizen?			☐ Yes	"	☐ No	
Will	you be 18 years of age	on or t	pefore electio	n day?	Yes		☐ No	
16.5	ou checked 'No' in re	-	to olitier of	the above	do not comp	late this	tone.	癌
Are	you interested in servi	ng as a	n election wo	rker?	* Yes		No No	
	Last Name Include Suffix Fr (Jr. Sr. III)	any I	First Name		Middle Name	Form	ner Name (if or	my)
•	Residence Address: Se none, describe where you live. Address:				City House	We	TEXAS	
					County	19	Zip Code フォッタラ	
4	Making Address: Street	vacrees ar	o Apartment Num	ber.	City		State	
	per man carrior but but more as to y	DOF FEEDOS					Zip Code	
5	Date of Birth: (mm/dd/v	(vv)	6 6	der (Options Male Female	7 Telephor	e Numb	er (Optional)	
	Texas Driver's License No LD. No. (issued by the Depart				s Driver's License			on,
.D	☐ Social Security	Numbe	r.					
_	I understand that giving for state and federal law. Cor \$2,000, or both. Please rea	relation e	of this crime m	ay result in i	mprisonment up			
	I am a resident of this co	-						
	 I have not been finally co any term of incarceration 							g
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	X				Date			
Sign	ature of Applicant or Agent ar			nt or Printed	Name of Applicant	if Signed I		
AND AND	REPORT OF STREET, SALES AND ADDRESS.	CONTRACTOR AND ADDRESS.					CONTRACTOR OF STREET	

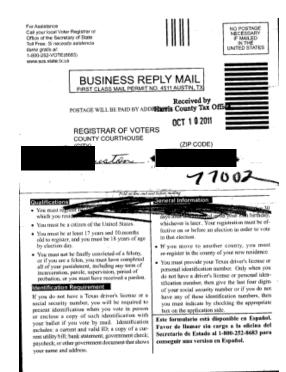


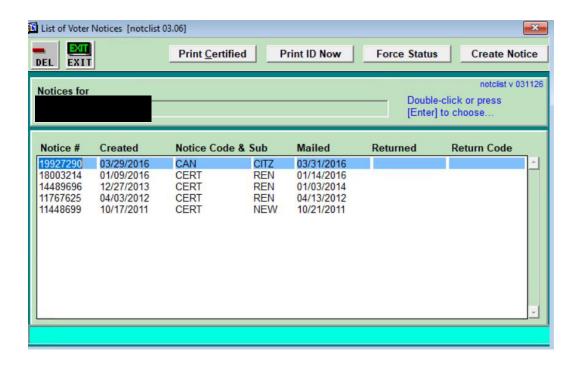
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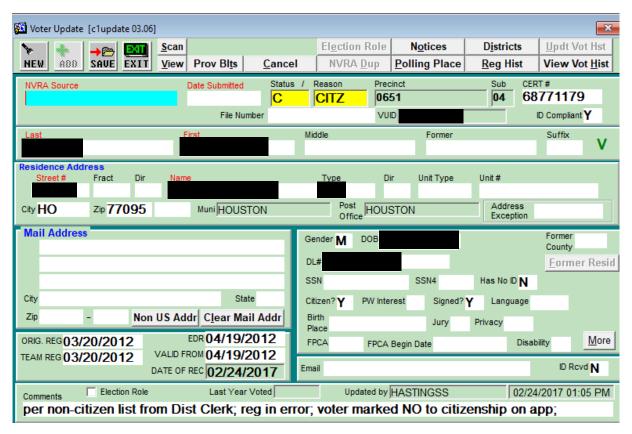


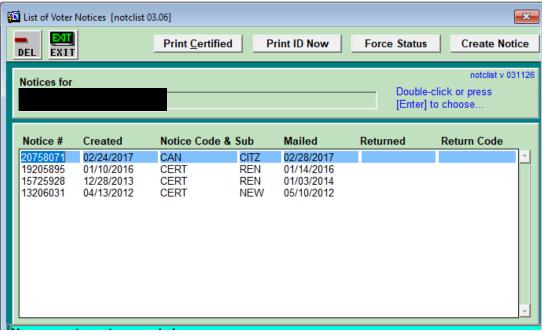
Texas Voter Registration	Application		
SXGS YOUR NEURINGING	PANIONESANOM I	For Official Cor Only	
295202592	istrar or X89, tav.	we any questions abo the Secretary of Stat w.sos.state.ts.us.	e's Office toll
 These Questions Mus 	st Be Completed Be	fore Proceeding	
Check one Town Application Are you a United States Citizen? Will you be 18 years of age on or be	Change of Address and/or Nam	Request for a Rep	Nacement Card
2 Last Name	First Name	No. of the last	
3 store you ive. (to an include 100 floor, it	lesse du	Middle Name of mys	Former Name
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he delivered to your residence address.)	described administra in 1000 character	Houston	77587
and described to your remains and the l		South	TX
		Houston	Zip Code てつうをフ
(c carac (massers))	Gender (Optional)		1.318
	☐ ☐ Male ☐ Fernale		
8		its of some Sected Security	
I understand that giving false informa-	rion to procure a voter registratio	e is perjury, and a crime	under state
and federal law. Conviction of this or offices that I am a resident of this county and U.S. Ci have not been finally consisted of a fela of instruction, purely, supervision, po- have not been determined by a final jud- incapacitated or partially mentally inca-	itizen; ny, or if a frinn, I have completed viol of probation, or I have been	p to 180 days, a fine up to all of my punishment inc perduned; and	52,090, or both.
Emature of Apptik	Applicant or Printed Name	9.261 Only of Applicant if Signed by	Witness and Duto.



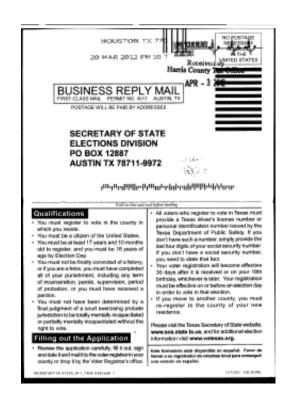


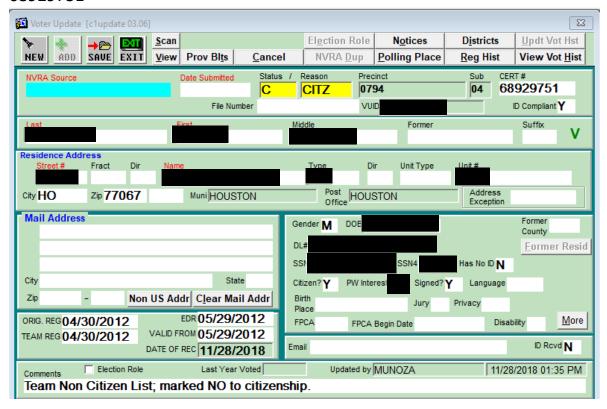
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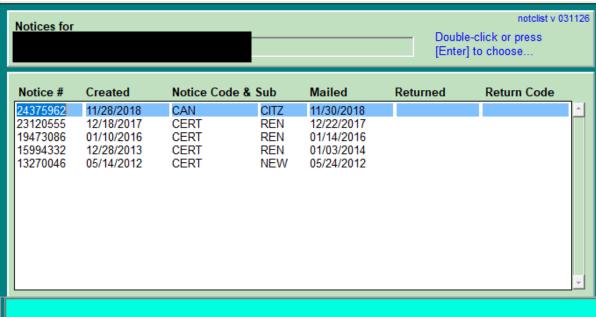




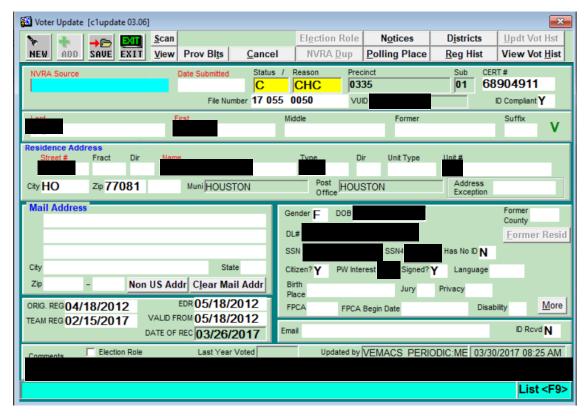
lexas Voter	Registration	n Application	For Official C	in Only
Please c please c			i Before Pro	
Che 2988 154	93706	or second a second state	_	or a Replacement Card
			'Yes	72 /4
Will you be 18 ye	ars of age on c	or before election day?	V ∑ Yes	□ No
If you checked	No in respon	ase to either of the abo	ve, do not complet	e this form.
Are you interests	d in serving as	an election worker?		
Last Name in	dude Saffia if any	First Name	Middle Name	Former Name (Lasy)
Residence A note, describe of	cidires ac Street As nere non tires, clip act	Street and Apartment Number: roude PG Box. Rust R. or Busin	Cay HMST. County HARRIS	TEXAS TX
Maillen Addo		1 de la constitución de la const	MARKI	77013
	095 C Street Address delivered to your rea	s and Apartment Number lickence address. j	City	State
5pmE	AS	ABOVE		Zip Code
Bate of Birth	[mmddhyyy]	Gender (Opé ∫ bloin ☐ Fornale	Telephone Include Area	Number (Optional) Code
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white and feder	ral law, Consistio	formation to procure a voto on of this crime may result i three statements to affirm b	n imprisonment up to	y, and a crime under 180 days, a fine up to
		and a U.S. citizen;		
any term of i	incarceration, par sen determined b	ed of a felony, or if a feloe, i is role, supervision, period of y a final judgment of a cou- tially mentally incapacitate	probation, or I have be florerriging probate is	ien pardoned; and
X			Date 03	11512012
Signature -	1	Nip to Applicant or Print	nd Name of Applicant IFS	igned by Witness and Date.
SECRETARY OF STATE	(2011 <u>)</u> †16(k) 1000 (av	M I		12/15/8 (1 16/03:00 PM)

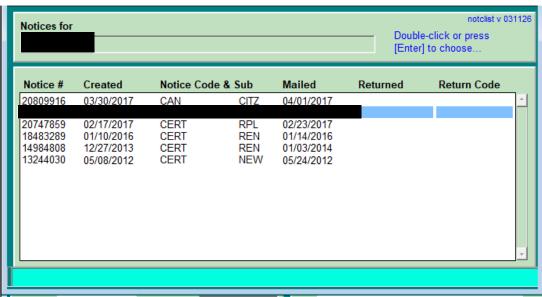






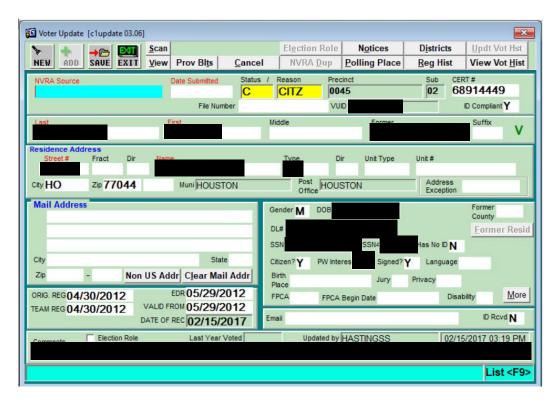


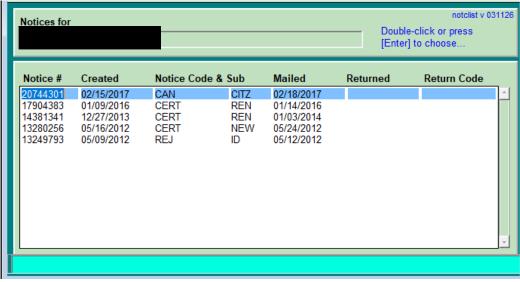


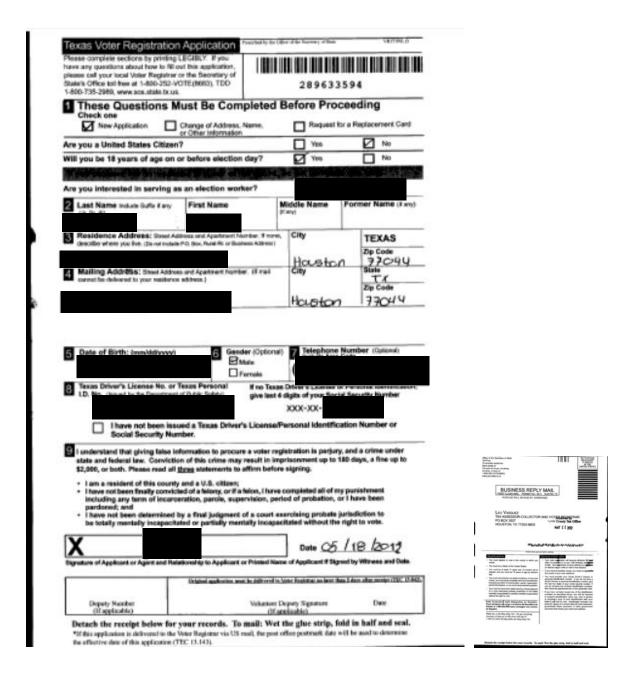


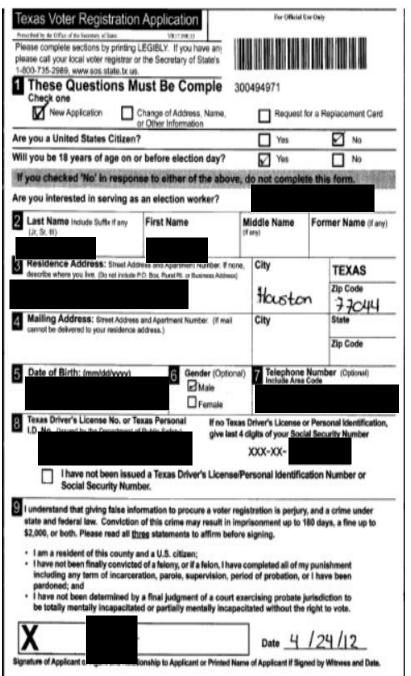






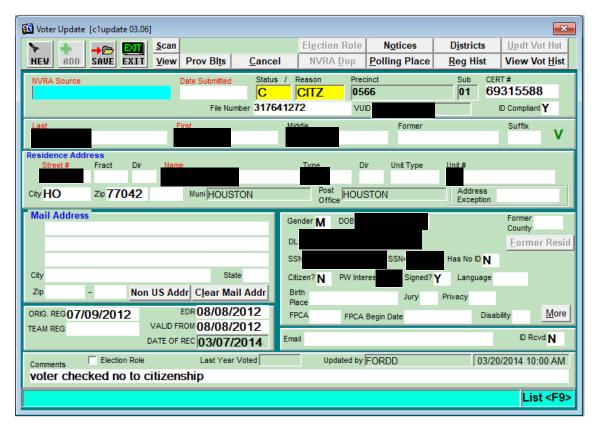


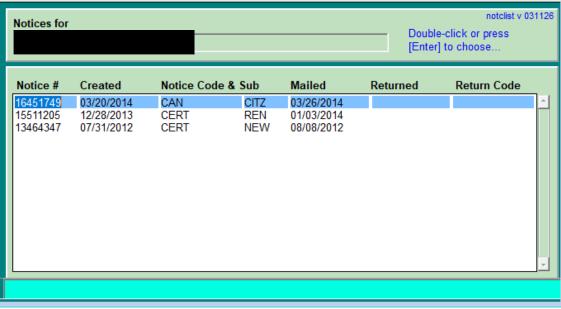






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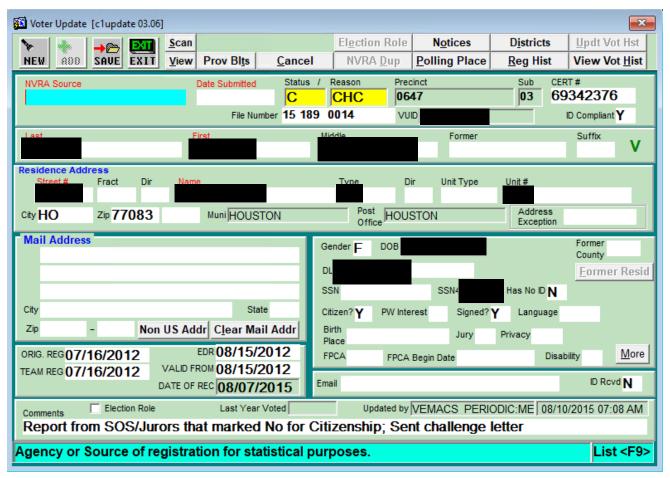
These questions must be com	41272	
Check one New Application Change of Address, Name, or Other Information	Request fo	r a Replacement Card
Are you a United States Citizen?	Yes	Ø No
Will you be 18 years of age on or before election day?	Yes	□ No
If you checked this in ridicates to differ of the above	, do net complete	This tons.
Are you interested in serving as an election worker?		
2 Last Name Include Suffix if any - First Name (Jr. Sr. III)	Middle Name	Former Name (if any)
(04, 04, 18)	0.00	NA
3 Residence Address: Street Address	City	TEXAS
 none, describe where you live. (Do not include P.O. Box, Rural Rt. or Business Address) 	MOUSTON	78
	County	Zip Code
	Harri 3	State
(If mail cannot be delivered to your residence address.)	AS abou	€ Zip Code
5 Date of Birth: (mm/dd/yyyy) 6 Gender (Option Image: Gender (Option Image: Gender (Option	7 Telephone M	lumber (Optional)
	4 digits of your Social	
I understand that giving false information to procure a voter state and federal law. Conviction of this crime may result in \$2,000, or both. Please read all three statements to affirm be	imprisonment up to 1	
 I am a resident of this county and a U.S. citizen; I have not been finally convicted of a felony, or if a felon, I have 	o completed all of mu	nunis beneat in abudic a
any term of incarceration, perole, supervision, period of p		
 I have not been determined by a final judgment of a court mentally incapacitated or partially mentally incapacitated 		
Signature or approxim or agreements removable to Applicant or Printed		05 9014

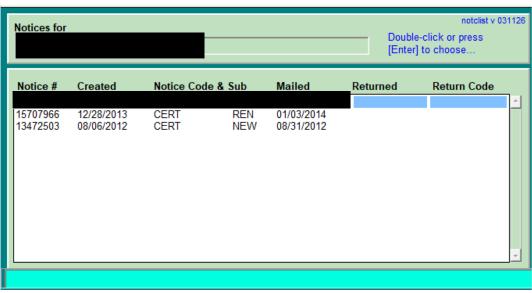
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Texas Voter Registration	Application	For ABULA	in the k
Prescribed by the Office of the Secretary of State	VIOLENIED THE RELEASE		
Please complete sections by printing L please call your local voter registrar.	EGIBLY. If you ha		
1 These Questions Mu	st Be Con 30129	2440	-
Check one	/	2410	
New Application	hange of Address, Name, r Other Information	Request	for a Replacement Card
Are you a United States Citizen?		Yes Yes	No No
Will you be 18 years of age on or	before election day?	Yes	Ø Nb
If you checked 'No' in respons	e to either of the above	, do not comple	te this form.
Are you interested in serving as	an election worker?		bars
2 Last Name Include Suffix Farry (Jr. Sr. III)	First Name	Middle Name	Former Name (Fany)
			NIA
Kesidence Address: Street A	ress and Apartment Number. If	11	TEXAS
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		Harpis	Zip Code 7-7-04/2
manning reserves a contribution	es operations number.	City	State
If mail cannot be delivered to your resid	ence address.)	·,	
AS above			Zip Code
Date of Birth: (mm/dd/yyyy)	Gender (Options	7 Telephone	Number (Optional)
	Male		
R Texas Driver's License No. or Tex	Female		
I.D. No. (Issued by the Department of	D. Adv. C. A. a	is Driver's License o 4 digits of your Soci	r Personal Identification, al Security Number
		xxx-xx-	
have not been issued	i a Texas Driver's License/	Personal Identifie	ation Number or
Social Security Numb		rersonal fueliulic	audii Number or
I understand that giving false info state and federal law. Conviction	of this crime may result in i	mprisonment up to	ry, and a crime under 180 days, a fine up to
\$2,000, or both. Please read all th		ore signing.	
 I am a resident of this county a I have not been finally convicted 		completed all of m	v nuniehment includion
any term of incarceration, pare	le, supervision, period of pr	obation, or I have be	een pardoned; and
I have not been determined by mentally incorrectated as and	a final judgment of a court e by mentally incapacitated w	xercising probate ju rithout the right to v	urisdiction to be totally ote.
Y]	10010000
		_	109 9013
Signature of	nship to Applicant or Printed	Name of Applicant if S	igned by Witness and Date.

69342376:





Texas Voter Registration Application **Tractive by the Utilize of the Secretary of State Please complete sections by printing LEGIBLY. If you to please call your local voter registrar:		
These Questions Must Be Co 3013 Check one New Application Change of Address, Name, or Other Information	62709 Request t	for a Replacement Card
Are you a United States Citizen?	☐ Yes	☐ No
Will you be 18 years of age on or before election day?	☐ Yes	No No
If you checked 'No' in response to either of the abo	ve, do not comple	te this form
Are you interested in serving as an election worker?		
2 Last Name Include Suftx if any First Name	Middle Name	Former Name (if any)
3 Residence Address: Street Address and Apartment Number none, describe where you live. (Do not installe P.O. Box. Rusel Rt. or Busin Address)		TEXAS Zip Code TTOR3
Mailing Address: "Street Address and Apartment Number. (If mail cannot be delivered to your residence address.)	City	State Zip Code
5 Date of Birth: (mm/dd/yyyy) 6 Gender (Opt	onal) 7 Telephone include Area	Number (Optional) Code
	ast 4 digits of you <u>r Soci</u> XXX-XX-	
I understand that giving false information to procure a vo state and federal law. Conviction of this crime may result \$2,000, or both. Please read all three statements to affirm I am a resident of this county and a U.S. citizer: I have not been finally convicted of a felony, or if a felon, I any term of incarceration, parole, supervision, period of the process of	in imprisonment up to before signing. have completed all of m f probation, or I have b ert exercising probate j	180 days, a fine up to y punishment including een pardoned; and urisdiction to be totally
	Date 7	116/12.

Received by Harris County Tax Office

JUL 2 7 2012

Voter Registration Dept.

BUSINESS REPLY MAIL
FIRST-CLASS MAIL PERMIT NO. 4511 AUSTIN, TX

POSTAGE WILL BE PAID BY ADDRESSEE

SECRETARY OF STATE ELECTIONS DIVISION PO BOX 12887 AUSTIN TX 78711-9972 NO POSTAGE NECESSARY IF MAILED IN THE UNITED STATES



րհագարակիկիրականացրությունակությերինինին հերևիրար

Fold on line and seal before reality

Qualifications

- You must register to vote in the county in which you reside.
- You must be a citizen of the United States.
- You must be at least 17 years and 10 months old to register, and you must be 18 years of age by Election Day.
- You must not be finally convicted of a felony, or if you are a felon, you must have completed all of your punishment, including any term of incarceration, parole, supervision, period of probation, or you must have received a pardon.
- You must not have been determined by a final judgment of a court exercising probate jurisdiction to be totally mentally incapacitated or partially mentally incapacitated without the right to vote.

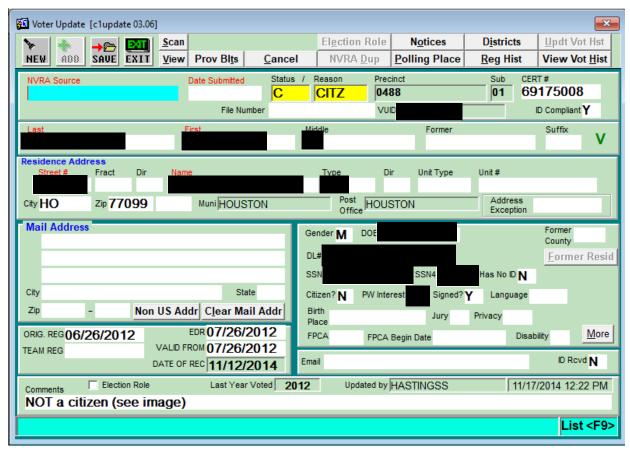
Filling out the Application

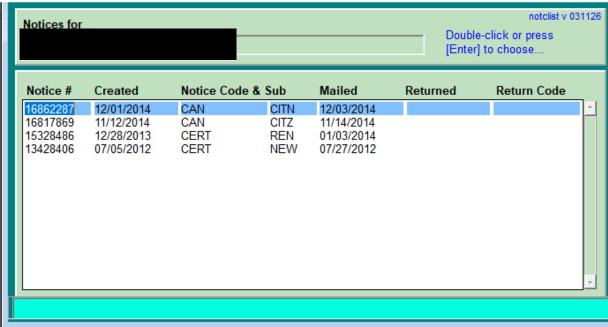
 Review the application carefully, fill it out, sign and date it and mail it to the voter registrar in your county or drop it by the Voter Review

- All voters who register to vote in Texas must provide a Texas driver's license number or personal identification number issued by the Texas Department of Public Safety. If you don't have such a number, simply provide the last four digits of your social security number. If you don't have a social security number, you need to state that fact.
- Your voter registration will become effective 30 days after it is received or on your 18th birthday, whichever is later. Your registration must be effective on or before an election day in order to vote in that election.
- If you move to another county, you must re-register in the county of your new residence.

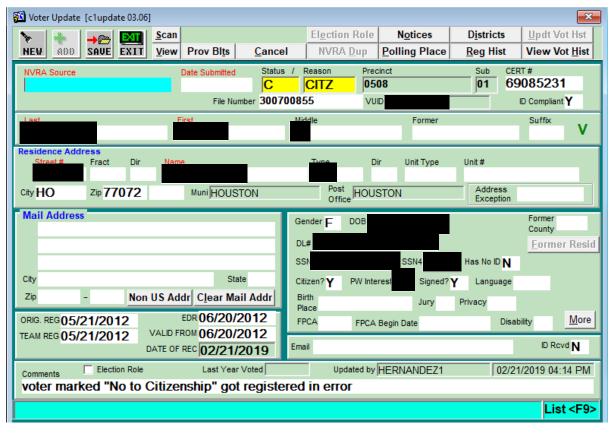
Please visit the Texas Secretary of State website, www.sos.state.tx.us, and for additional election information visit www.votexas.org.

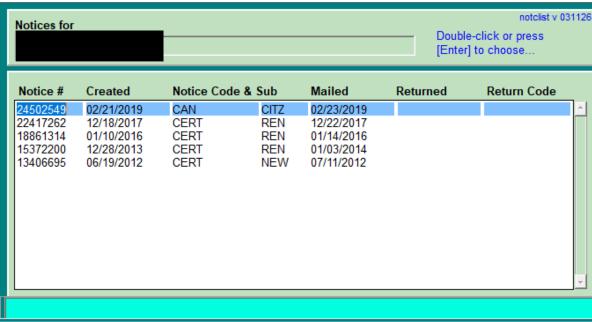
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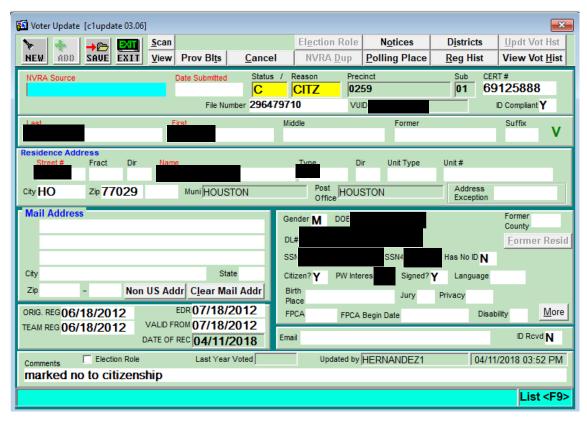


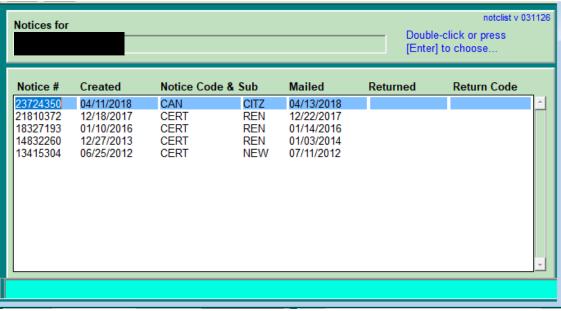
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Check one		
New Application Change of Address, Nam or Other Information	e, Request fo	or a Replacement Card
e you a United States Citizen?	☐ Yes	No.
ill you be 18 years of age on or before election day		□ No
f you checked 'No' in response to either of the a		e this form.
e you interested in serving as an election worker?		
Last Name Include Suffix if any First Name	Middle Name	Former Name (1 any)
Residence Address: Street Address and Apertment Numi none, describe where you live. (Do not ledude P.O. Box, Runel Rt. or bu Address).	ber. if City Houston	TEXAS
ACCIPIED)	County	Zip Code
Mailing Address: Street Address and Apartment Number.	City	77099 State
(if mail cannot be delivered to your residence address.)	_ `	Zip Code
S AME ABOUT		
Date of Birth: (mmitribcon) 6 Gepder (C	Optional) 7 Telephone Include Area	Number (Optional) Code
Ď Femal	le	
	no Texas Driver's License or	
gr	we last 4 digits of your Social XXX-XX-	i Security Number
I have not been issued a Texas Driver's Lic		ation Number or
Social Security Number.	Periodic er sonial residence	acon Hambur Or
I understand that giving false information to procure a ve	oter registration is perjury	and a crime under
state and federal law. Conviction of this crime may result \$2,000, or both. Please read all three statements to affirm	n before signing.	80 days, a fine up to
I am a resident of this county and a leading of it is felon I have not been finally convicted of a felony, or if a felon	- yet	neurla han ent
including any term of incarceration, parole, supervisitional pardoned; and	on, period of probation, or	ri have been
 I have not been determined by a final judgment of a c 		
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gnature or Applicated or Agent and Helationship to Applicant or P	rinted Name of Applicant If S	igned by Witness and Date.



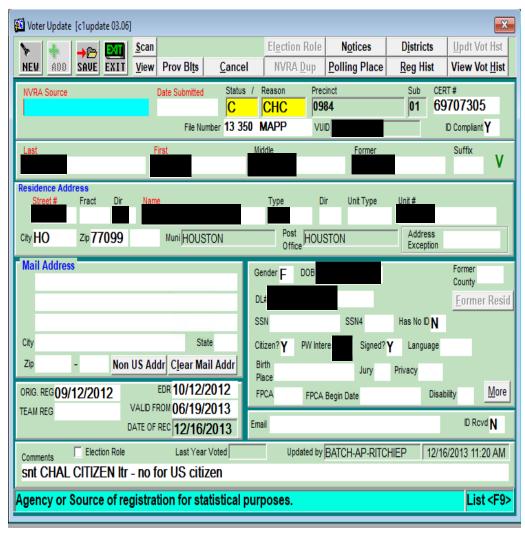


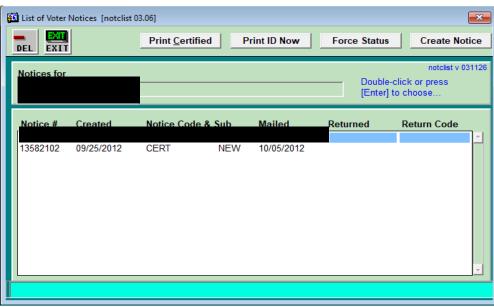






Texas Voter Registration Application	Tor Official End-Life	*
hear'	ons about how to fill ou	t this application,
a. IIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIII	3efore Proce	eding
298479710	Request for a	Replacement Card
or Other Information	☐ Yes —	740
Are you a United States Citizen? Will you be 18 years of age on or before election day?	☐ Yes	No.
If you checked 'No' in response to either of the abo	ve, do	
Are you interested in serving as an election worker?	, og en en	
2 Last Name Include Suffer Farry First Name	Middle Name (farg)	ormer Name (Famp)
RE Residence Address: Street Address and Apartment Number and include P.O. Box. Punil Pt. or Busin	Houston	TEXAS
	County	71824
d Mailing Address: Street Address and Apartment Number.	City	State
(if must carnot be delivered to your residence address-)		Zip Code
5 Date of Birth: (mm/dd/yyyy) 6 Gender (Op Male	e	
8 Texas Driver's License No. or Texas Personal H no	Texas Driver's License or last 4 digits of your Social	Personal identification, Security Number
LD, No. (Issued by the Department of Public Solidy) give	XXX-XX	
I have not been issued a Texas Driver's Lice Social Security Number.	200	tion Number or
State and federal law. Conviction of this crime may result \$2,000, or both. Please read all three statements to affire.		y, and a crime under 180 days, a fine up to
 I am a resident of this county and a U.S. citizen; 	the completed all of m	y punishment including
 It have not been determined by a final judgment of a centrally incapacitated or partially mentally incapacit 	tated without the right to	vote.
X	Date 4	1612012
Signature of Applicant or Agent and Relationship to Applicant or R	Printed Name of Applicant If	Signed by Within and Cons.
SECRETARY OF STATE 2011, VIOLITIES AND 1		(3709)) 502:39 PM





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If you checked 'No' in respons		<u> </u>	□ No
Are you interested in serving as	Charles and the second section of	ove, up not compil	ne ma rum.
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		County	Zip Code 7759
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Date of Birth: (mm/dd/yyyy)	Gender (Op ☐ Male ☑ Female	Include Area	A Code
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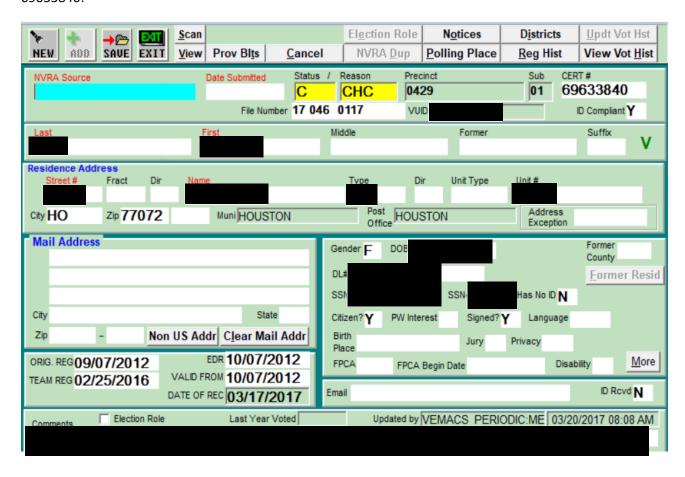
BUSINESS REPLY MAIL FIRST-CLASS MAIL PERMIT NO. 4511 AUSTN. TX SECRETARY OF STATE Harris County to C **ELECTIONS DIVISION** HAY 2 0 2013 PO BOX 12887 AUSTIN TX 78711-9972 Voter Registration Dept. լագերիկիցիատերահակիկիցիկիս» <u>"</u> Field in the mail.

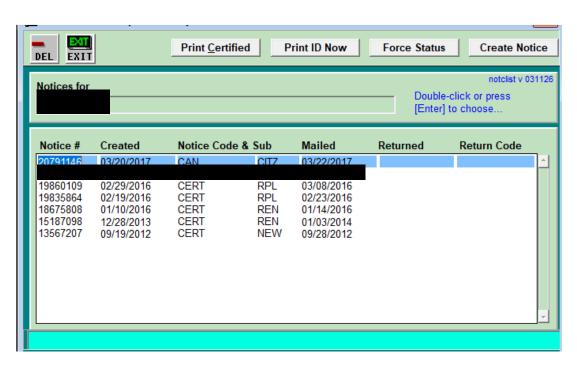
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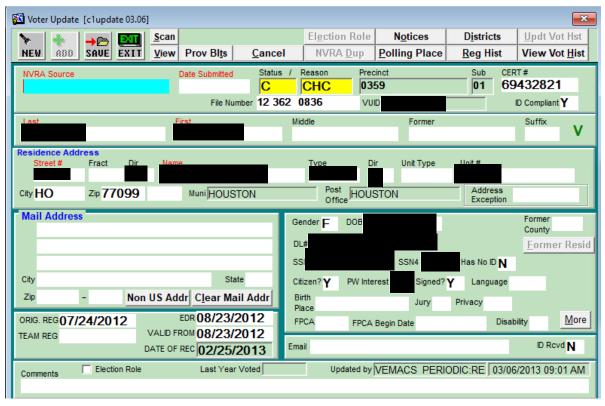
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(if realizament be delivered to your residence address.)	Zip Code	
5 Date of Birth: (nm/dd/yyyy)	Include Area Code	NO POSEAGE NECESSARY FINE N THE NATIO SATES
Dell	xas Driver's License or Personal Identification, st 4 digits of your Social Security Number	BUSINESS REPLY MAIL PAST CLASS MIL. FERRIT NO. 4511 J. AUSTIN. TX
I have not been issued a Texas Driver's Licens Social Security Number.	XXX-XX- se/Personal Identification Number or	SECRETARY OF STATE Received by ELECTIONS DIVISION Harris County Tax Office PO BOX 12887 AUSTIN TX 78711-9972
I understand that giving false information to procure a vote state and federal law. Conviction of this crime may result i \$2,000, or both. Please read all <u>three</u> statements to affirm be	n imprisonment up to 180 days, a fine up to	Voter Registration Dept րհերկիցիկիցիկին արերվակարի հիրիվորը քմն ու հա տեսն ինա ամար
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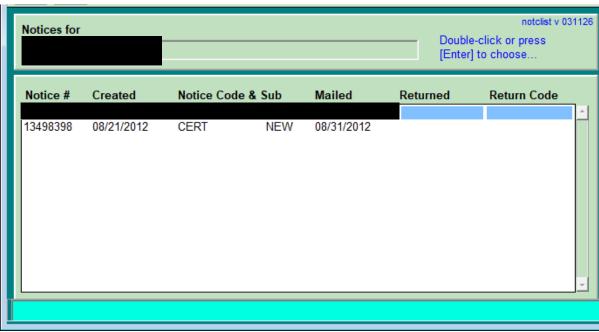


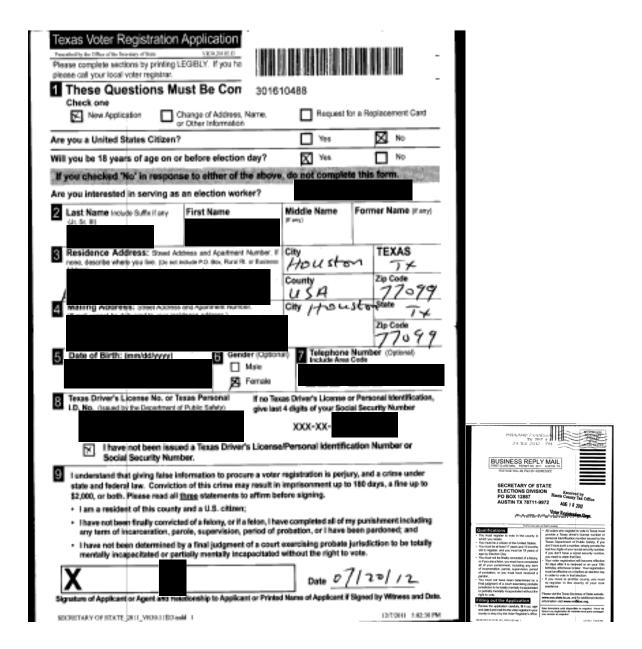


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New Application Change of Address, Name or Other Information	Request f	for a Replacement Car		
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Will you be 18 years of age on or before election day?	7 Yes	□ No		
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Are you interested in serving as an election worker?	☐ Yes	☐ No		
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Texas Driver's License No. or Texas Personal If no	Texas Driver's License or last 4 digits of your Confession XXX-XX	Personal Identification	BUSINESS REPLE	MICESSARY F MALED IN THE UNITED STATES Y MAIL 11 AUSTIN TX
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X		118/2016	parson. You must not have been determined by a final judgment of a court exercising probate jurisdiction to be totally mentally incapacitated or pertially mentally incapacitated without the	So days aims it are recollected for registration to the country of a late of corresponding to the country of the country of the country of the country of your new residence. Please visit the Texas Secretary of State Please visit the Texas Secretary of State
Signature of Applicant or Agent and receivorship to Applicant or Prin	ited Name of Applicant if S	gned by Witness and E	Filling out the Application	website, www.sos.state.bu.se, and for additional election information visit www.votebexas.gov. Each translate and disposition or equalst. From the literate as a registration de votantes local para consequir sais venido en equition.

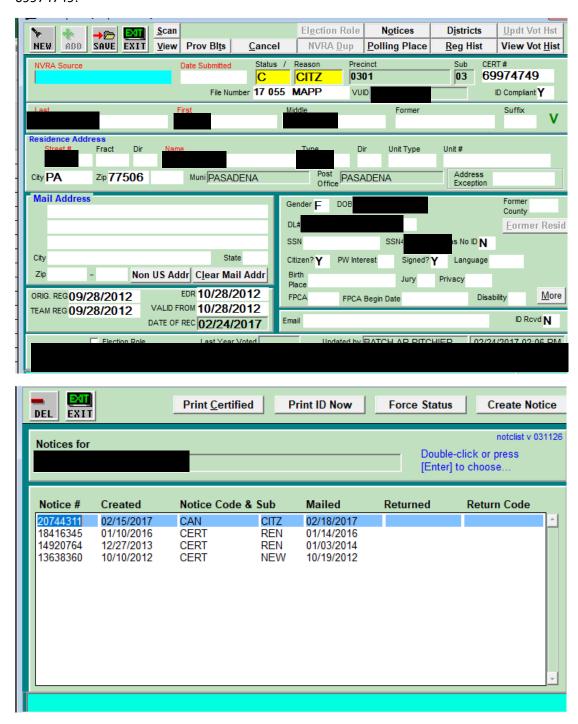




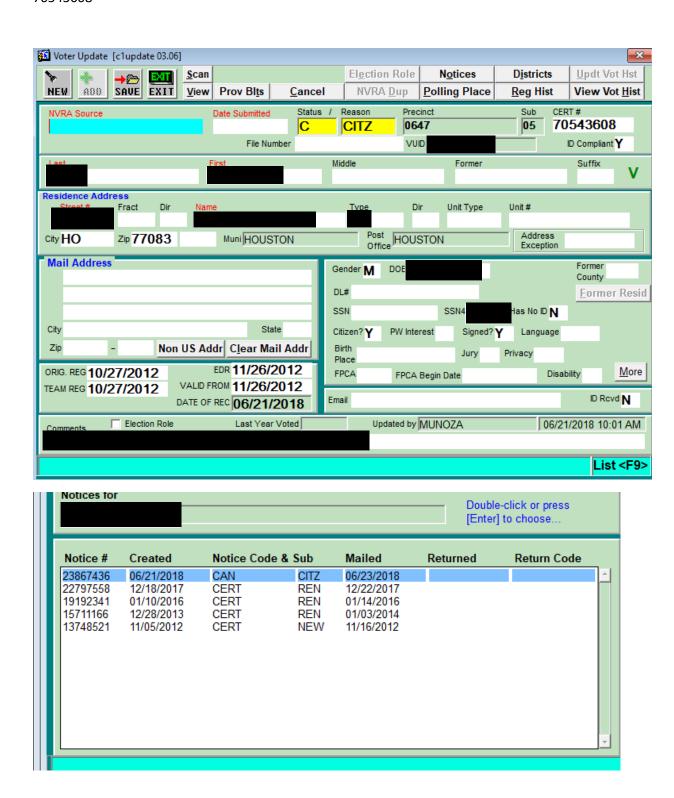








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	sse call your local voter registrar.	Ediber: II journave i		
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Will	you be 18 years of age on or	before election day?	Yes	□ No
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Are	you interested in serving as	an election worker?		
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For Assistance
Call your local Voter Registrar of Control of the Secretary of State
Toll Free: Si necesita asistencia llame gratis at:
1-800-252-VOTE(8683)
www.sos.state.tx.us

NO POSTAGE NECESSARY IF MAILED IN THE UNITED STATES

BUSINESS REPLY MAIL FIRST CLASS MAIL PERMIT NO. 4511 AUSTIN, TX

POSTAGE WILL BE PAID BY ADDRESSEE

REGISTRAR OF VOTERS COUNTY COURTHOUSE (CITY)

(ZIP CODE)

Houston

TX 77253



Qualifications

Fold on line and seal before mailing

V.

- You must register to vote in the county in which you reside.
- · You must be a citizen of the United States.
- You must be at least 17 years and 10 months old to register, and you must be 18 years of age by election day.
- You must not be finally convicted of a felony, or if you are a felon, you must have completed all of your punishment, including any term of incarceration, parole, supervision, period of probation, or you must have received a pardon.

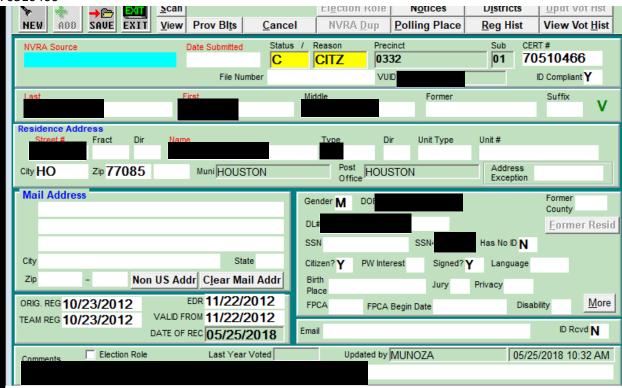
Identification Requirement

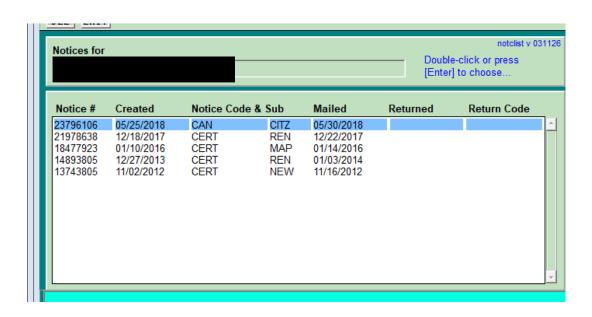
If you do not have a Texas driver's license or a social security number, you will be required to present identification when you vote in person or enclose a copy of such identification with your ballot if you vote by mail. Identification includes: a current and valid ID; a copy of a current utility bill; bank statement; government check; paycheck; or other government document that shows your name and address.

General Information

- Your voter registration will become effective 30 days after it is received or on your 18th birthday, whichever is later. Your registration must be effective on or before an election in order to vote in that election.
- If you move to another county, you must re-register in the county of your new residence.
- You must provide your Texas driver's license or personal identification number. Only when you do a chave a driver's license or personal identification number, then give the last four digits of wait social security number or if you do not have any of these identification numbers, then you must indicate by checking the appropriate bot in the application side.

Este formulario está disponible en Español. Favor de llamar sin cargo a la oficina del Secretario de Estado al 1-800-252-8683 para conseguir una version en Español.





Please complete sections by printing LEGIBLY. If you have		
please call your local voter registrer.		HINE DITHE IN
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Will you be 18 years of age on or before election day?		Ø №
If you checked 'No' in response to either of the above	, do not complete	this form.
Are you interested in serving as an election worker?	☐ Yes	4
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		aned by Witness and Date.

Received by Heeria County Tux Collice



GCT 23 2212

Voter Regisirovika Dept.

BUSINESS REPLY MAIL FIRST-GLASS MAIL PERMIT NO. 4511 AUSTIN, TX

POSTAGE WILL BE PAID BY ADDRESSEE

SECRETARY OF STATE ELECTIONS DIVISION PO BOX 12887 AUSTIN TX 78711-9972 NO POSTAGE NECESSARY IF MALED IN THE UNITED STATES



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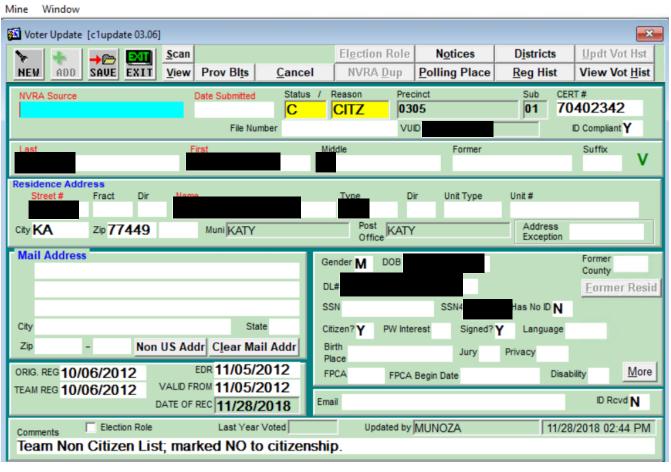
- You must register to vote in the county in which you reside.
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- You must not be finally convicted of a felony, or if you are a felon, you must have completed all of your punishment, including any term of incorporation, parole, supervision, period of probation, or you must have received a partice.
- You must not have been determined by a final judgment of a court exercising probate jurisdiction to be totally mentally incapacitated or partially mentally incapacitated without the right to vote.

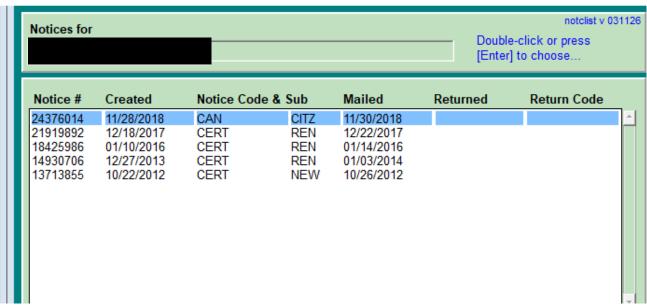
Filling out the Application

 Review the application carefully, fill it out, Fight and date transmall it to the voter registranin your county or dirto it by the Noter Specialization office.

- All voters who register to vote in Texas must provide a Texas driver's license number or personal identification number issued by the Texas Department of Public Safety. If you don't have such a number, simply provide the last four digits of your social security number. If you don't have a social security number, you need to state that fact.
- Your voter registration will become effective 30 days after it is received or on your 18th birthday, whichever is later. Your registration must be effective on or before an election day in order to vote in that election.
- If you move to another county, you must re-register in the county of your new residence.

Phasse visit the Texas Secretary of State website, www.sos.state.tx.us, and for additional election information visit www.votexas.org.





	n Applicati	00	Fer Official U	er Chally
Presented by the Office of the Security of New Please compliete sections by printing please call your local voter registrar of 1-800-735-2969, www.sos.state.bx.us These Questions Machine Check one	or the Secretary L	303872637	Hequest	fion, IDD
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Vill you be 18 years of age on		ction day?	▼ Yes	□ No
If you checked 'No' in respon			do not comple	te this form.
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2 Last Name Include Suffix if any (Jr. St. III)	First Nam		Middle Name	Former Name (If any)
955: Street Ad	dress and Apartr	sent Number. If none,	City	TEXAS
describe where you live. (Do not include	P.O. Sen. Rural Rt.	or Business Address)	Katy	Zip Code 77449
carnot be delivered to your residence	a widress.)	CONTRACTOR STORY	city Katy	Texas Zip Code 77449
5 Date of Birth: (mm/dd/yyyy)	6	Gender (Optional	7 Telephone	Number (Optional)
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For Assistance Cell your local Voter Registrar or Office of the Secretary of State Toll Free: Si necesite asistencia Name gratis at: 1-800-252-VOTE(8683) www.sos.state.bcus



NO POSTAGE NECESSARY IF MAILED IN THE UNITED STATES

BUSINESS REPLY MAIL FIRST CLASS MAIL PERMIT NO. 4511 AUSTIN, TX

Received by

Harris County Tax Office

OCT 0 6 2012

REGISTRAR OF VOTER Registration Dept.

(ZIP CODE)

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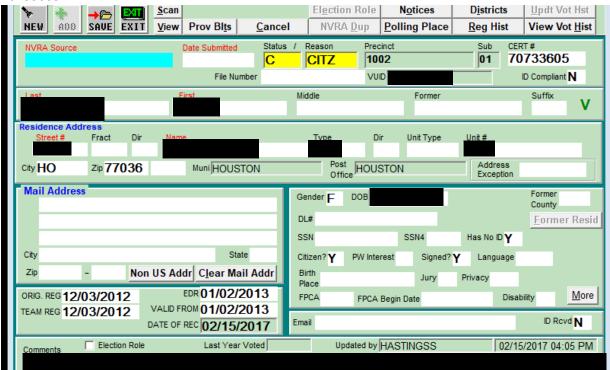
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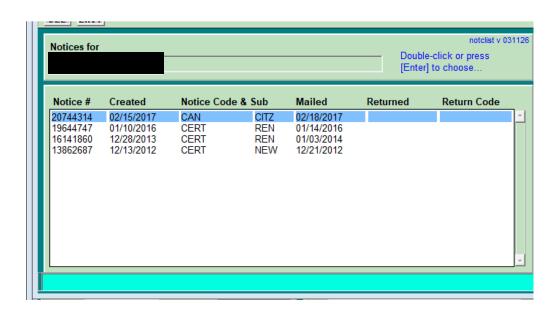
You must register to vote in the county in which you

- · You must be a citizen of the United States.
- You must be at least 17 years and 10 months old to register, and you must be 18 years of age by election day.
- · You must not be finally convicted of a felony, or if you are a felon, you must have completed all of your punishment, including any term of incarceration, period of probation, or you must have received a par-
- You must not have been determined by a final judgment of a court exercising probate jurisdiction to be totally mentally incapacitated or partially mentally incapacitated without the right to vote.
- Ente Attaviarie s. 1/ / la cficina del Secretano de Or an Stationary will a i 103-152-bood para conceguir una versio en Green.

General Information

- Your voter registration will become effective 30 days after it is received or on your 18th birthday, whichever is later. Your registration must be effective on or before an election day in order to vote in that election.
- If you move to another county, you must re-register in the county of your new residence.
- You must provide your Texas driver's license or personal identification number. If you do not have a driver's license or personal identification number, give the last four digits of your social security number. If you do not have any of these identification numbers, then check the appropriate box on the application side.
- if you have not been issued any of the identification numbers as described above, you will be required to present identification when you vote in person or enclose a copy of such identification with your ballot if you vote by mail, identification includes: any photo ID; a copy of a named with help bank statement; government or a cap, as an other government document th... was as name and address.





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please call your local voter registrar.		DR HELLENG FOLLOWS	
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Will you be 18 years of age on or bef	ore election day?	York	No.
If you checked 'No' in response to	either of the above	, do not complet	e this form.
Are you interested in serving as an e	lection worker?		
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NO POSTAGE NECESSARY IF MAILED IN THE UNITED STATES



POSTAGE WILL BE PAID BY ADDRESSEE.

SECRETARY OF STATE Received by ELECTIONS DIVISION Matris County Tax Office PO BOX 12887 DEC - 3 2012 AUSTIN TX 78711-9972

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Voter Registration Dept.

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Qualifications

- Qualifications

 You must register to vote in the county in which you reside, or the United States.

 You must be at least 17 years and 10 months cid to register, and you must be 16 years of age by Election Day.

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Filling out the Application

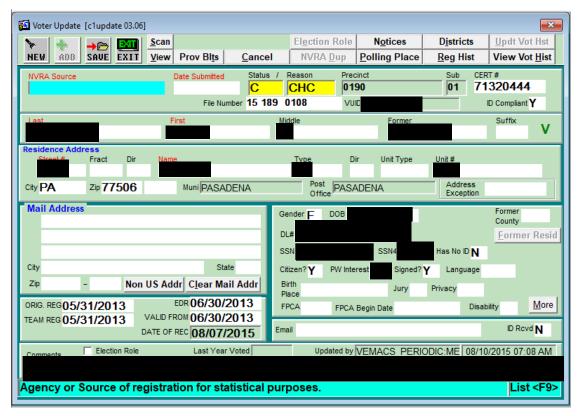
Review the application corefully, fill it out, sign and date it and mail it to the voter register in your county or drop it by the Voter Register's office.

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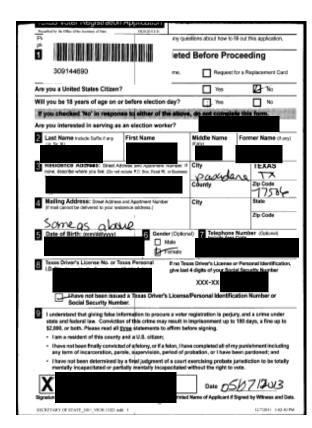
Please visit the Texas Secretary of State website, www.sos.state.tx.us, and for additional election information visit www.votexas.org.

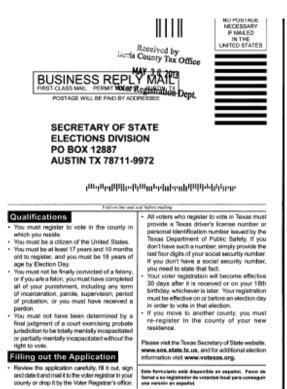
All voters who register to vote in Texas must provide a Texas driver's license number or personal identification number issued by the Texas Department of Public Safety. If you don't have such a number, simply provide the last four digits of your social security number, you need to state that fact.
You then have a social security number, you need to state that fact.
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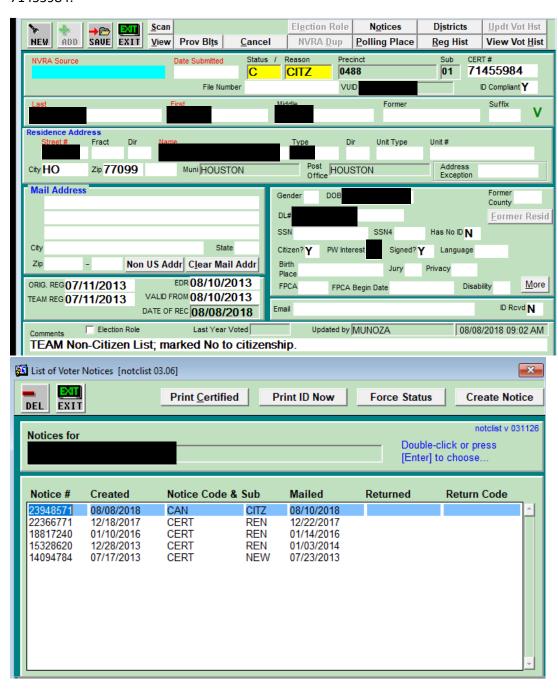
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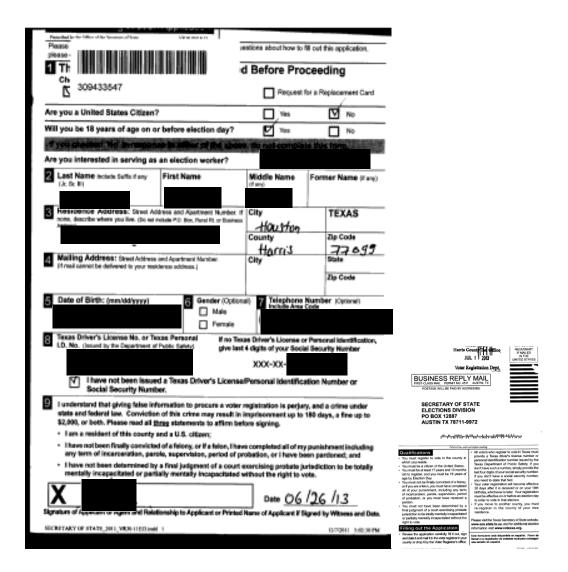


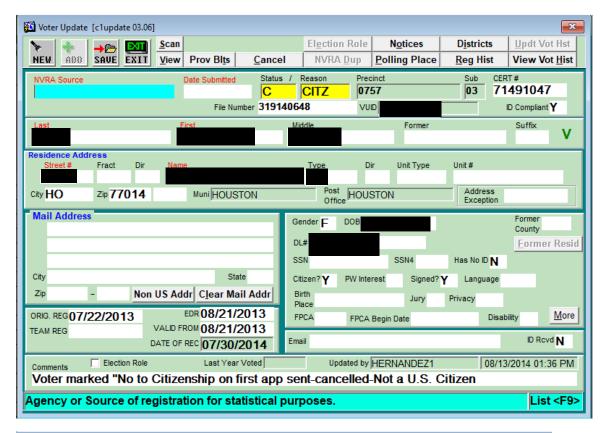


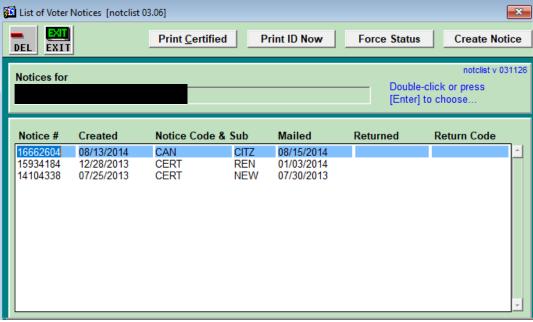






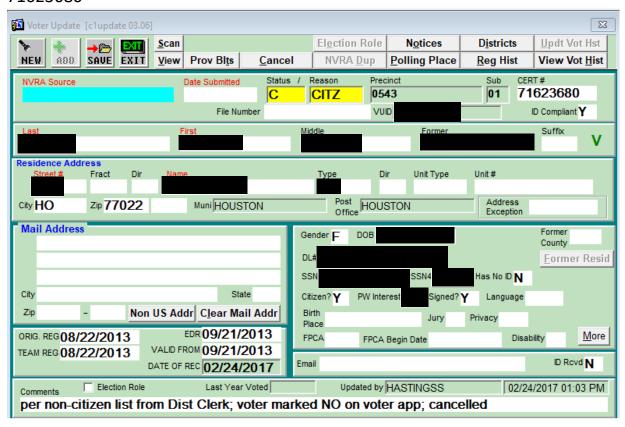


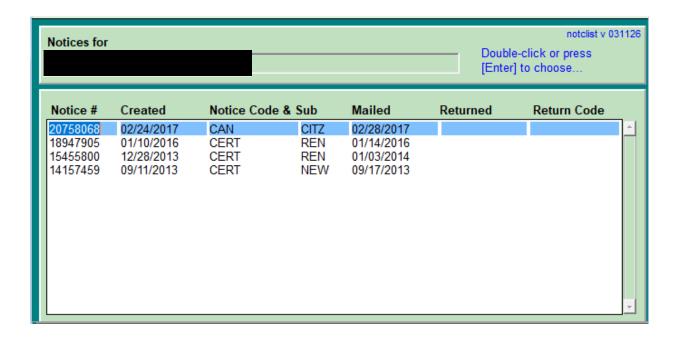


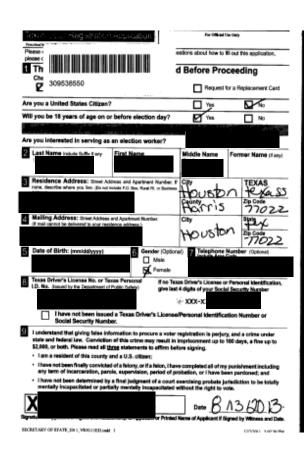


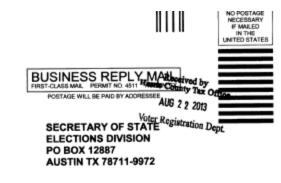
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Are you interested in serving as an election worker?		2000
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(If mail cannot be delivered to your residence address and Apartment Number.	CITYHOUSTON	***
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I have not been issued a Texas Driver's License Social Security Number.		
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Qualifications

- You must register to vote in the county in
- which you reside. You must be a closely which you reside. You must be at least 17 years and 10 months old to register, and you must be 18 years of age by Election Day.
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- or propagon, or you must have received up pardon. You must not have been determined by a fluid judgment of a court exercising probate jurisdiction to be totally mentally incapacitated or partially mentally incapacitated without the

Filling out the Application

Review the application carefully, fill it out, sign and date it and mail it to the voter registrer in your county or drop it by the Voter Registrar's office.

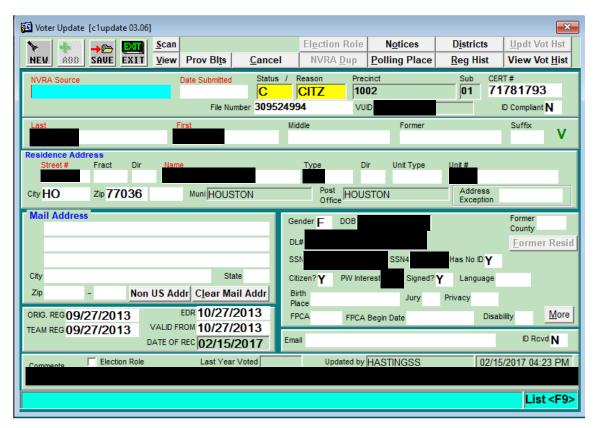
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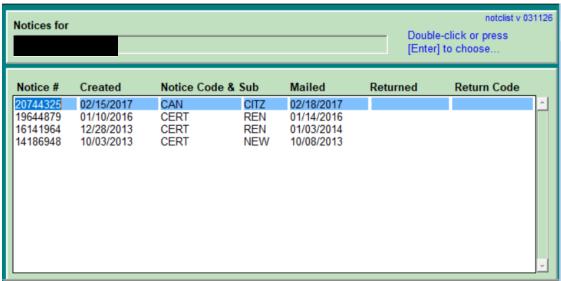
Please visit the Texas Secretary of State website, www.sos.state.bu.us, and for additional election information visit www.votexas.org.

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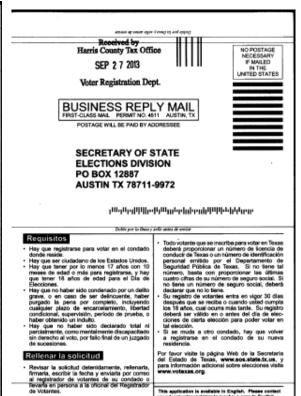
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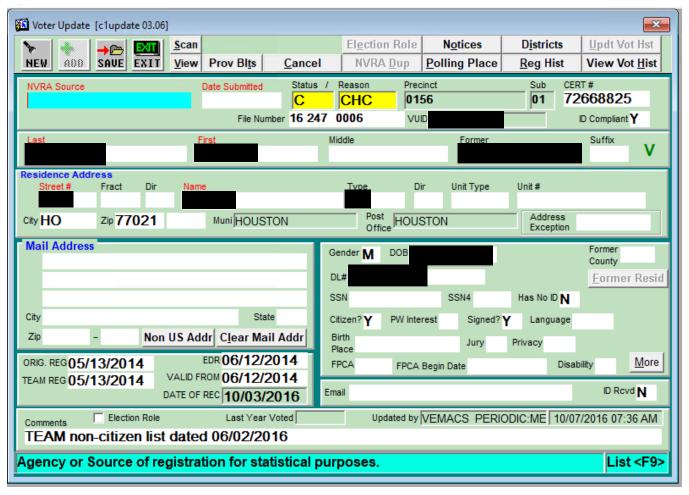
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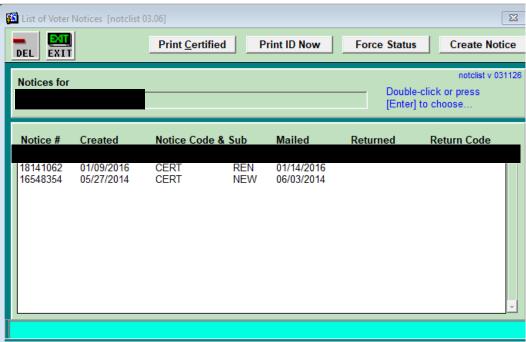












Texas Voter Registration Application	Principles by the Officers of the Inspiratory of Basic VICE 2001 ED
Please complete sections by printing LEGIBLY. If you have any questions about how to fill out this application, please call your local Voter Registrar at (713) 388-2000.	306964176
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New Application Change of Address, or Other Information	Name, Request for a Replacement Card
Are you a United States Citizen?	☐ Yes No
Will you be 18 years of age on or before election	day? Ves No
If you checked 'No' in response to allow of a	withdra, do not complete this form.
Are you interested in serving as an election work	er? Yes No
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BUSINESS REPLY MAIL FIRST CLASS MAIL PERMIT NO. 4511 AUSTIN, TX

POSTAGE WILL BE PAID BY ADDRESSEE

Received by Harris County Tax Office MAY 16 2014

Mike Sullivan

PARRIS COUNTY TAX ASSESSOR-COLLECTOR

AND VOTER REGISTRAR

O BOX 3527

HOUSTON, TX 77253-9803

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Qualifications

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- You need not have been determined by a final judgment, of a court exercising probate jurisdiction to be totally reentally incapacitated or partially mentally incapacitated without the sight to vote.

Por favor visite la página Web de la Secretaria del Estado de Texas, www.sos.state.tx.us, y para información adicional sobre elecciones visite www.volexas.org.

Hây truy cập Irang with của Tổng Thư Kỳ Tiểu Bang Taxas, www.ses.state.tx.us, và để biết thêm thông tin bầu cử hây truy cập www.vetexas.org.

類於兩種克羅斯州州泰爾爾敦:www.sos.state.tx.us,若應 原更多選挙資訊,預款而 Hisk www.volexus.org。

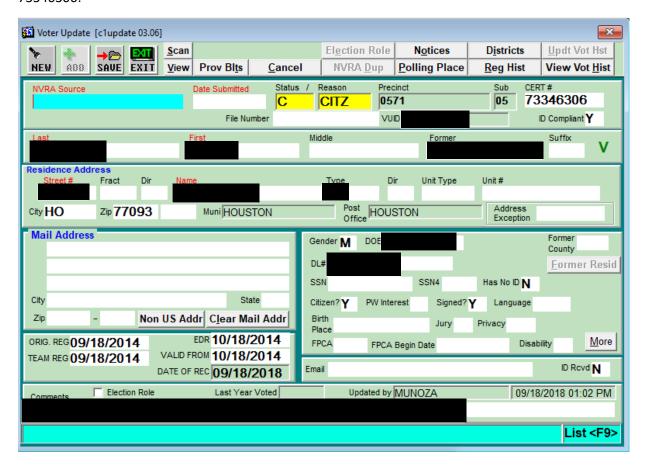
Filling out the Application

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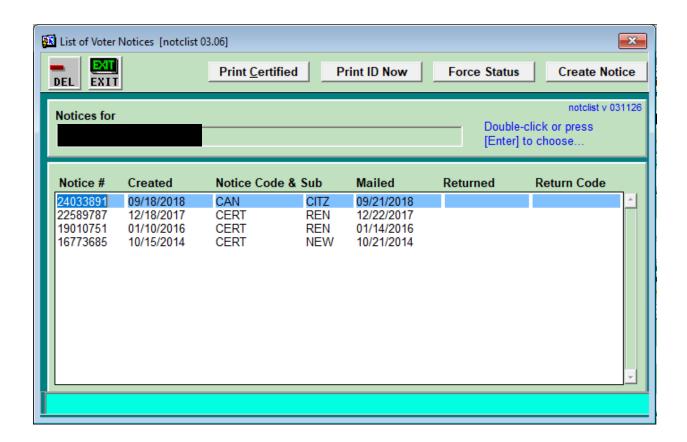
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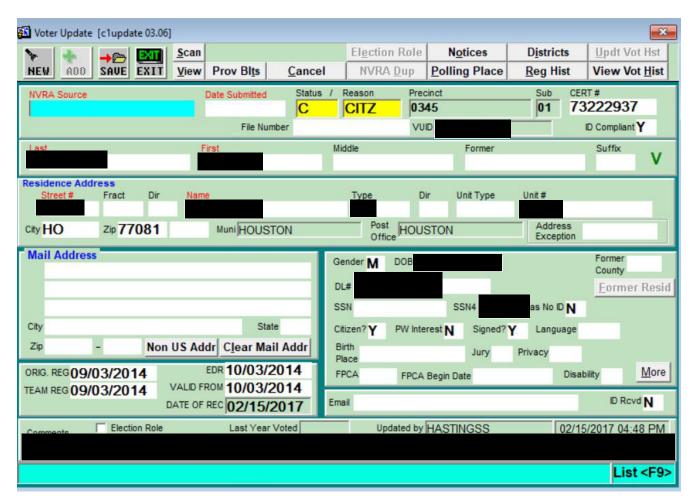
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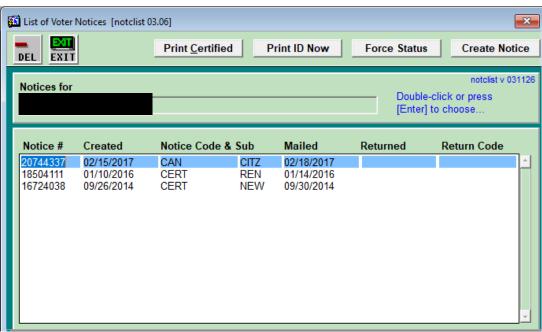


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Will you be 18 years of age on or	before election day?	Ø Yes	□ No
If you checked 'No' in respons	e to either of the above	, do not complet	e this form.
Are you interested in serving as	an election worker?	☐ Yes	□ No
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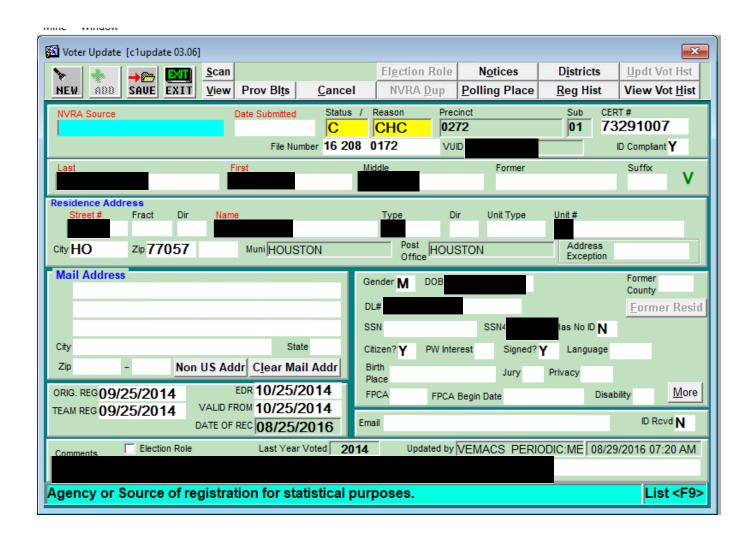
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Call your local Voter Registraces: SEIP "E4 Office of the Secretary of State Toll Free: St recoults asistonical 7 L facte grade at: 1-800-252-VOTE(8683) www.sos.state.tc.us



NO POSTACIE **VECESSAGN** FMALED NUMBER UNITED STATES

BUSINESS REPLY MAIL FIRST CLASS MAIL PERMIT NO. 4511 AUSTIN, TX

POSTAGE WILL BE PAID BY ADDRESSEE

TAX ASSESSOR-COLLECTOR AND Received Tax Office PO BOX 3527 HOUSTON, TX 77253-3527

SEP 2 9 2014

Voter Registration Dept.

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Qualifications.

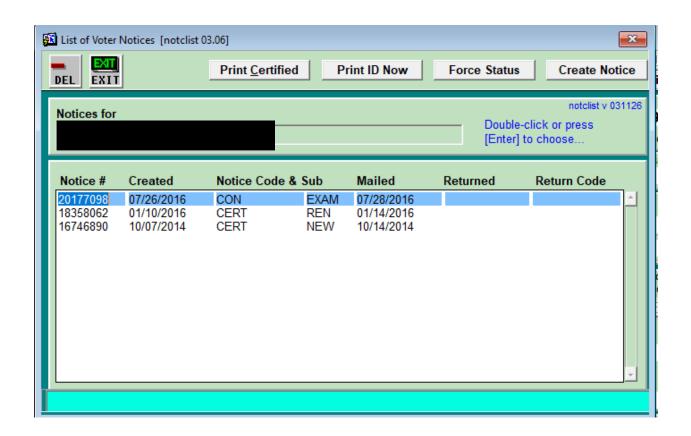
- You must register to vote in the county in which you reside.
- You must be a citizen of the United States.
- You must be at least 17 years and 10 months old to register, and you must be 18 years of age by election day.
- You must not be finally convicted of a felony, or if you are a felon, you must have completed all of your punishment, including any term of incarcuration, parole, supervision, period of probation, or you must have received a perdon.

If you do not have a Texas driver's license or a social security number, you will be required to present identification when you vote in purson or enclose a copy of such identification with your ballot if you vote by mail. Identification includes: a current and valid ID; a copy of a current utility bill; bank statement; government check; paycheek; or other government document that shows your name and address.

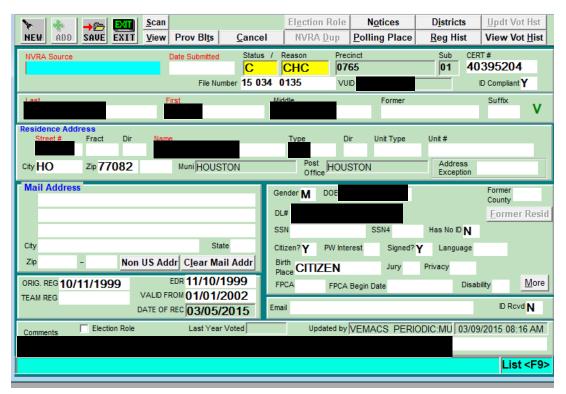
General Information

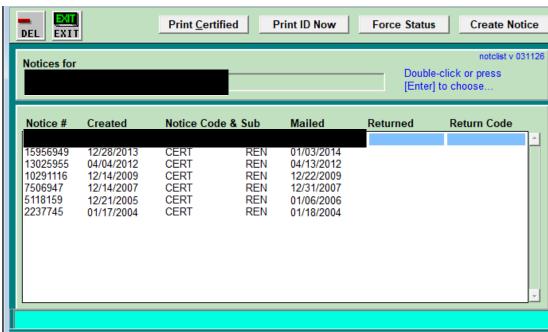
- Your voter registration will become effective 30 days after it is received or on your 18th birthday, whichever is later. Your registration must be effective on or before an election in order to vote in that election.
- · If you move to another county, you must re-register in the county of your new residence.
- You must provide your Texas driver's license or personal identification number. Only when you do not have a driver's license or personal identification number, then give the last four digits of your social security number or if you do not have any of these identification numbers, then you must indicate by checking the appropriate box on the application side.

Este formulario está disponible en Español. Favor de llamar sin cargo a la oficina del Secretario de Estado al 1-800-252-8683 para conseguir una version en Español.



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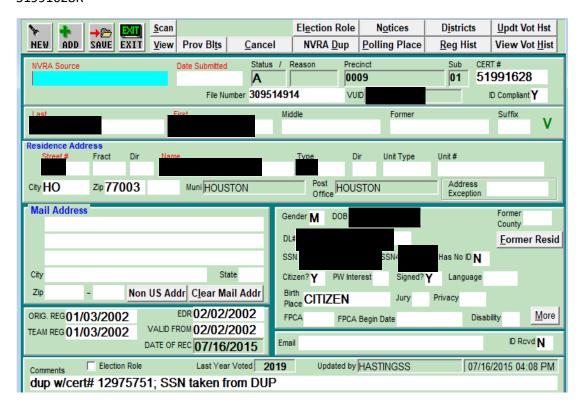


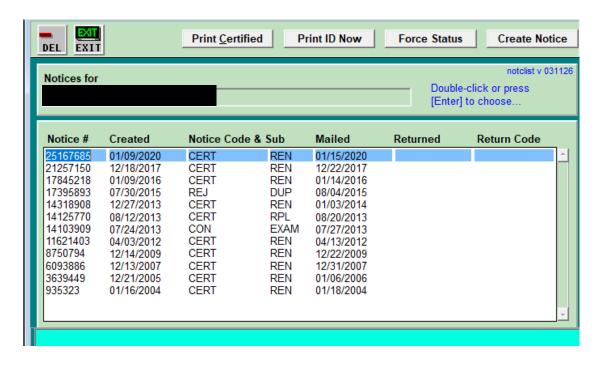


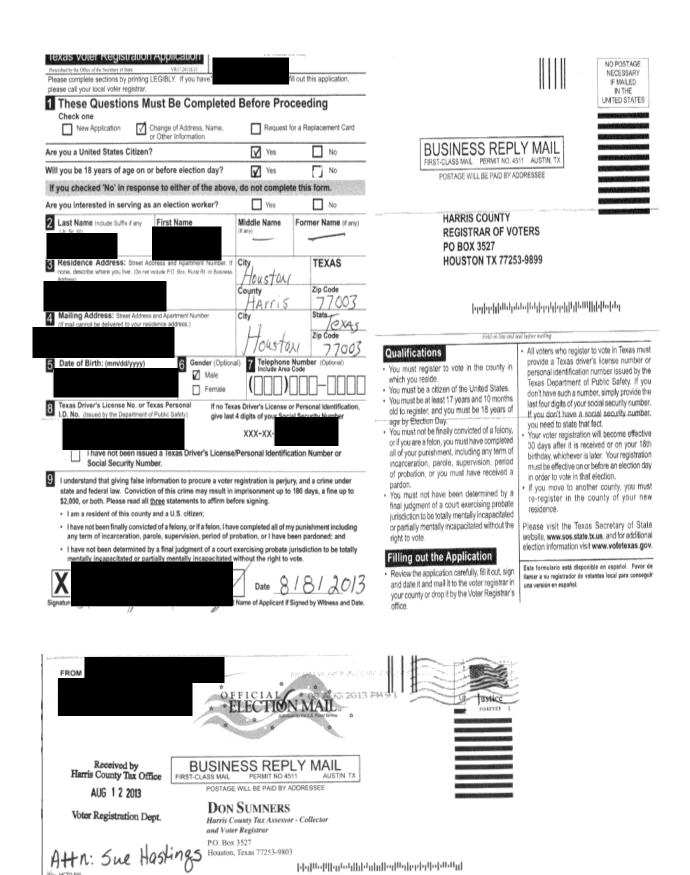
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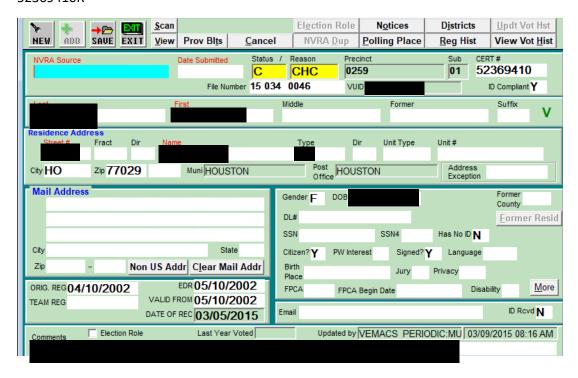


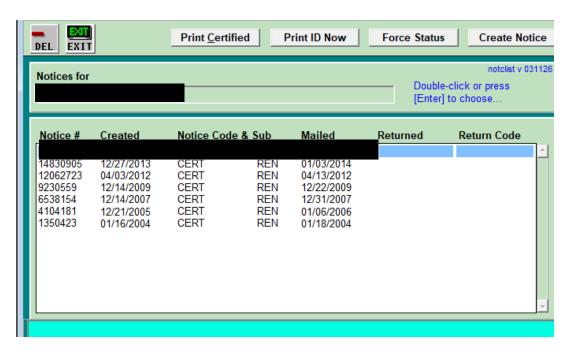






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For Assistance Call Si Necesità Asistencia Secretary of State's Liame Gratis Al' Office Toll Free' 1-800-252-(VOTE) 8683



NO POSTAGE NECESSARY IF MAILED IN THE UNITED STATES

BUSINESS REPLY MAIL FIRST CLASS MAIL PERMIT NO 4511 AUSTIN, TX

POSTAGE WILL BE PAID BY ADDRESSEE

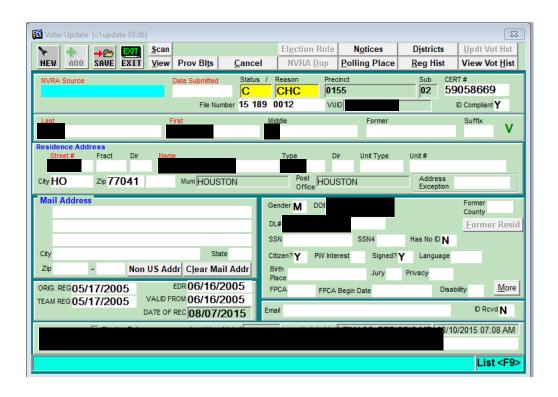
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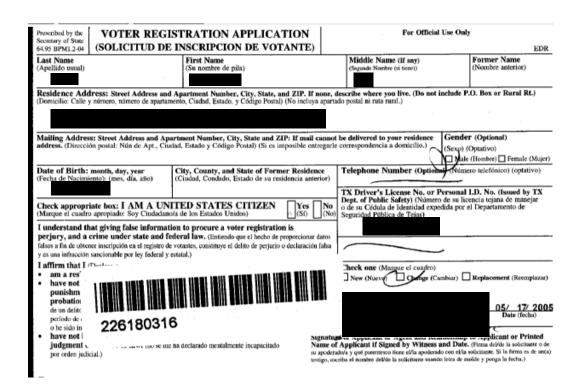
PAUL BETTENCOURT 7. 1)17, TAX ASSESSOR-COLLECTOR 11 P.O. BOX 3527 HOUSTON, TEXAS 77253-9942

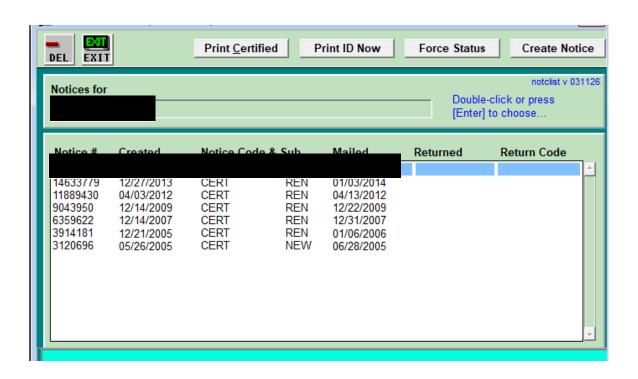


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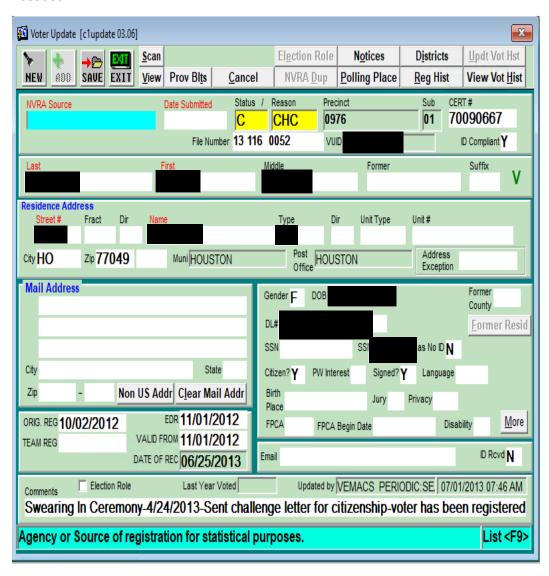
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Texas Voter Registration Application		IMMAN —
Prescribed by the Office of the Secretary of State VR17.2911E.13		100,000,000
Please complete sections by printing LEGIBLY. If you have 3084 please call your local voter registrar.	42316	_
1 These Questions Must Be Completed	Before Prod	eeding
Change of Address, Name, or Other Information	Request fo	r a Replacement Card
Are you a United States Citizen?	₩ Yes	□ No
Will you be 18 years of age on or before election day?	₽ Yes	□ No
Are you interested in serving as an election worker?		
2 Last Name Include Suffix If any First Name	Middle Name	Former Name (Fary)
3 Residence Address: Street Address and Apartment Number. If	City	TEXAS
none, describe where you live. (Do not include P.O. Box, Rural Rt. or Business Address)	HOUHON	Zip Code
	HUYY	77047
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I understand that giving false information to procure a voter state and federal law. Conviction of this crime may result in \$2,000, or both. Please read all <u>three</u> statements to affirm be	imprisonment up to	ry, and a crime under 180 days, a fine up to
 I am a resident of this county and a U.S. citizen; 		
 I have not been finally convicted of a felony, or if a felon, i have any term of incarceration, perole, supervision, period of p 	robation, or I have t	een parconec; and
 I have not been determined by a final judgment of a court mentally incapacitated or partially mentally incapacitated 	exercising probate	urisdiction to be totally
Y		1241B
Signature -		Signed by Witness and Date.

BUSINESS REPLY MAIL
FIRST-CLASS MAIL PERMIT NO. 4511 AUSTIN, TX
POSTAGE WILL BE PAID BY ADDRESSEE

SECRETARY OF STATE
ELECTIONS DIVISION
PO BOX 12887
AUSTIN TX 78711-9972

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Qualifications

- You must register to vote in the county in which you reside.
- · You must be a citizen of the United States.
- You must be at least 17 years and 10 months old to register, and you must be 18 years of age by Election Day.
- You must not be finally convicted of a felony, or if you are a felon, you must have completed all of your punishment, including any term of incarceration, parole, supervision, period of probetion, or you must have received a pardon.
- You must not have been determined by a final judgment of a court exercising probate jurisdiction to be totally mentally incapacitated or partially mentally incapacitated without the right to vote.

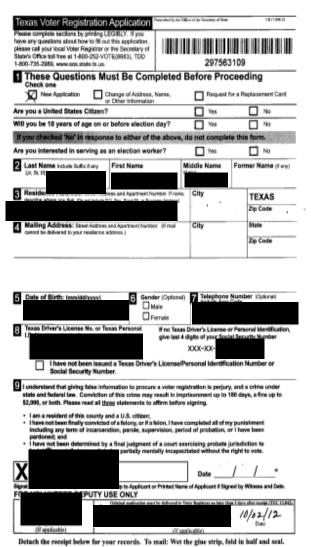
Filling out the Application

 Review the application carefully, fill it out, sign and date it and mail it to the voter registrar in your county or drop it by the Voter Registrar's office.

- All voters who register to vote in Texas must provide a Texas driver's license number or personal identification number issued by the Texas Department of Public Safety. If you don't have such a number, simply provide the last four digits of your social security number. If you don't have a social security number, you need to state that fact.
- Your voter registration will become effective 30 days after it is received or on your 18th birthday, whicher is later. Your registration must be effective on or before an election day in order to vote in that election.
- If you move to another county, you must re-register in the county of your new residence.

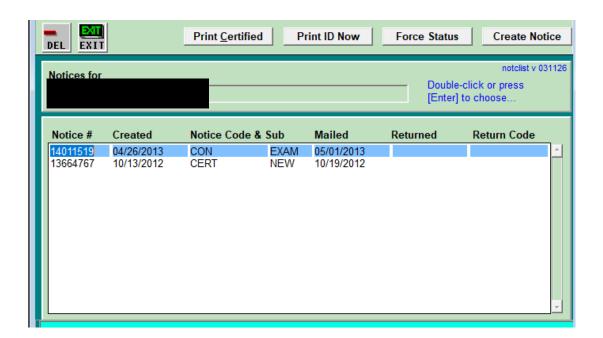
Please visit the Texas Secretary of State website, www.sos.state.tx.us, and for additional election information visit www.votetexas.gov.

Este formulario està disponible en sepañol. Favor de llamer a su registrador de votantes local para conseguir una versión en español.

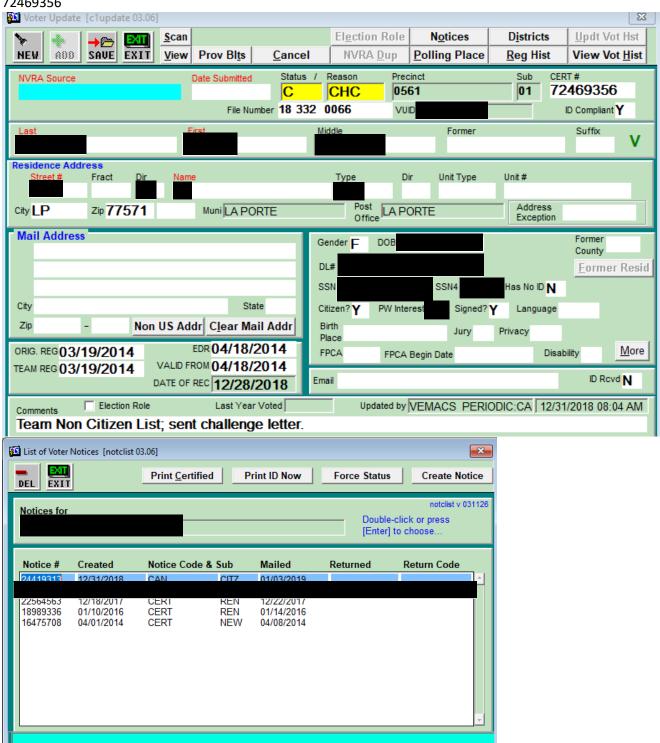


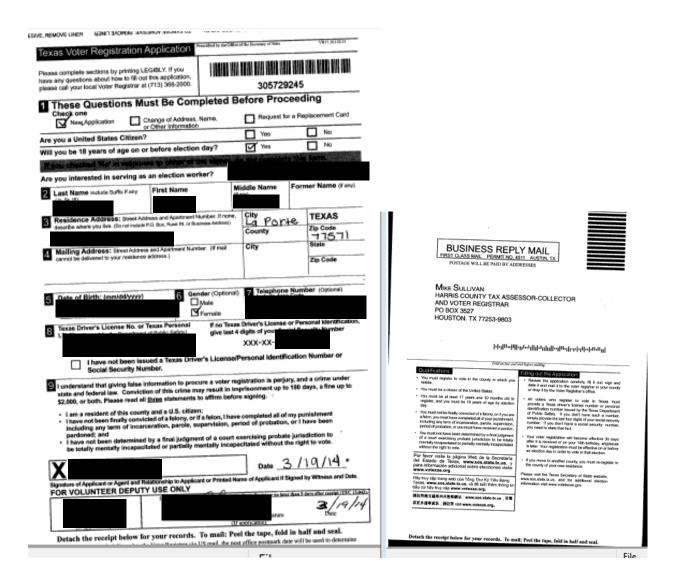
*If this application is delivered to the Voter Registrar via US mail, the past-office postmark date will be used to det the offsetive date of this application (TBC 13.143).

IN THE UNITED STATES **BUSINESS REPLY MAIL** FIRST CLASS MAIL PERMIT NO. 4511 AUSTIN, TX POSTAGE WILL BE PAID BY ADDRESSEE DON SUMNERS TAX ASSESSOR-COLLECTOR AND VOTER REGISTRAR PO BOX 3527 HOUSTON, TX 77253-9803 իկց|Ասվկիցըևսկ|իլիկց|ոլ|ԱցիարիցիաիսևԱր| Field on line and and helico moting Qualifications General Information Your votor registration will become effective 30 days after it is received or on your 18th birthday, whichever is later. Your registration must be effective, or or before an election day in order to vote in that election. You must register to vote in the county in which you You must be a citizen of the United States. You must be at least 17 years and 10 months old to register, and you must be 16 years of age by election If you move to another county, you must re-nighter in the county of your new residence. You must provide your Team driver's license or personal identification hamber. If you do not have a driver's license or personal identification number, give the last four sights of your social security number. If you do not have any of those identification numbers, then check the appropriate box on the application side. You must not be finally convicted of a fellow, or if you are a feton, you must have completed all of your punishment, including any term of incorporation, persie, supervision, period of probation, or you must have received a pendon. You must not have been determined by a final judgment of a court exercising probate jurisdiction to be statily mentally incapacitated or partially mentally incapacitated without the right to vote. If you have not been issued any of the identification numbers as described above, you will be required to passent identification when you sell be required or excise a copy of such identification with you shall be in person or excise a copy of such identification with your photo ID, a copy of a current origin pitch ID, a copy of a current origin pitch between the copy of a current origin pitch and or excise the copy of a current origin pitch and originate or a current origin pitch and originate or a current originate or Este formulario està disponible en Español. Favor de llamar sin cargo a la oficina del Secretario de Bistado al 1-000-352-6663 para conseguir una version en Español. Please visit the Tenas Secretary of State website, www.poc.state.bs.us and for additional election information visit www.vetexas.org. Phiếu này có sản hỗng tiếng Việt. Xin gọi văn phòng Secretary of State tại số chặn thoại miều phi số 1-800-252-8683 dễ nhận phiếu này hồng tiếng Việt. 在两中文原本·迪黎汀(免費電話養塔)1-800-252-6663 10/3/12 Detach the receipt below for your records. To mail: Wet the glue strip, fold in half and seal.



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CERT #	Answer to Citizenship Question	ORIG. REG	DATE OF REC	Voting Credit
35411966R	No	1996	2007	No
41441346	No	2000	2018	Yes
42078683	No	2001	2017	No
52461886R	No	2002	2013	No
56368905R	No	2004	2007	No
56238918R	No	2004	2018	No
56833684R	No	2004	2008	No
58354937R	No	2004	2007	No
57807075R	No	2004	2017	Yes
58768235R	No	2005	2017	Yes
59367375	No	2005	2007	No
59723338R	No	2005	2019	No
59610683R	No	2005	2017	No
64137201R	No	2008	2016	No
65902314R	No	2009	2016	No
65844532R	No	2009	2013	No
66886565R	No	2010	2015	No
67026161R	No	2010	2013	No
67789529R	No	2011	2017	No
68252196R	No	2011	2016	No
68118033R	No	2011	2017	No
67217117R	No	2011	2014	Yes
68158369R	No	2011	2016	No
68771179	No	2012	2017	No
68929751	No	2012	2018	No
68904911	No	2012	2017	No
68914449	No	2012	2017	No
69315588	No	2012	2014	No
69342376	No	2012	2015	No
69175008	No	2012	2014	Yes
69085231	No	2012	2019	No
69125888	No	2012	2018	No
69707305	No	2012	2013	No
69633840	No	2012	2017	No
69432821	No	2012	2013	No

69974749	No	2012	2017	No
70543608	No	2012	2018	No
70510466	No	2012	2018	No
70402342	No	2012	2018	No
70733605	No	2013	2017	No
71320444	No	2013	2015	No
71455984	No	2013	2018	No
71491047	No	2013	2014	No
71623680	No	2013	2017	No
71781793	No	2013	2017	No
72668825	No	2014	2016	No
73346306	No	2014	2018	No
73222937	No	2014	2017	No
73291007	No	2014	2016	Yes
40395204R	Blank	1999	2015	No
51991628R	Blank	2002	2015	No
52369410R	Blank	2002	2015	No
59058669R	Blank	2005	2015	No
70090667R	Blank	2012	2013	No
72469356	Blank	2014	2018	No

No.)		

IN THE SUPREME COURT OF TEXAS

In re JUAN GERARDO PEREZ PICHARDO AND PUBLIC INTEREST LEGAL FOUNDATION, INC.

Relators

Ann Harris Bennett, in her official capacity as Voter Registrar for Harris County, Texas, Respondent

AFFIDAVIT OF JUAN GERARDO PEREZ PICHARDO IN SUPPORT OF PETITION FOR WRIT OF MANDAMUS

Andy Taylor Andy Taylor & Associates, P.C. 2628 Highway 36S, #288 Brenham, TX 77833 Office: (713) 222-1817

Fax: (713) 222-1855

J. Christian Adams*
Noel H. Johnson*
PUBLIC INTEREST LEGAL FOUNDATION
32 East Washington Street, Suite 1675
Indianapolis, IN 46204
Tel: 317-203-5599

Counsel for Relators

*Application for pro hac admission forthcoming

State of Texas §
County of Harris §

BEFORE ME, the undersigned personally appeared Juan Gerardo Perez Pichardo who, swore the following:

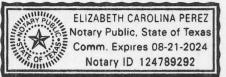
- 1. My name is Juan Gerardo Perez Pichardo. I am over 18 years of age, of sound mind, and competent to make this affidavit. I have personal knowledge of the facts stated herein, and they are true and correct to the best of my knowledge.
 - 2. I was born in 1942 in Mexico.
- 3. In 1969, I immigrated to the United States of America and became a legal permanent resident.
- 4. In 2000, I became a naturalized citizen of the United States of America.
 - 5. I am a registered voter in Harris County, Texas.
- 6. I intend to vote in the 2020 General Election and in other future elections in Harris County, Texas.

SIGNED this 3rd day of October 2020.

Juan Gerardo Perez Pichardo

SUBSCRIBED and SWORN TO before me, the undersigned authority, on the

3 day of October 2020.



Notary in and for the State of Texas

Tex. Elec. Code § 13.001

This document is current through the 2019 Regular Session, 86th Legislature, and 2019 election results.

Texas Statutes & Codes Annotated by LexisNexis® > Election Code > Title 2 Voter Qualifications and Registration (Chs. 11-20) > Chapter 13 Application for Registration; Initial Registration (Subchs. A-F) > Subchapter A Eligibility; Manner of Applying for Registration (§§ 13.001-13.030)

Sec. 13.001. Eligibility for Registration.

- (a)To be eligible for registration as a voter in this state, a person must:
 - (1)be 18 years of age or older;
 - (2)be a United States citizen;
 - (3)not have been determined by a final judgment of a court exercising probate jurisdiction to be:
 - (A)totally mentally incapacitated; or
 - **(B)**partially mentally incapacitated without the right to vote;
 - (4) not have been finally convicted of a felony or, if so convicted, must have:
 - (A) fully discharged the person's sentence, including any term of incarceration, parole, or supervision, or completed a period of probation ordered by any court; or
 - (B)been pardoned or otherwise released from the resulting disability to vote; and
 - (5)be a resident of the county in which application for registration is made.
- (b)To be eligible to apply for registration, a person must, on the date the registration application is submitted to the registrar, be at least 17 years and 10 months of age and satisfy the requirements of Subsection (a) except for age.
- (c)For purposes of Subsection (a)(4), a person is not considered to have been finally convicted of an offense for which the criminal proceedings are deferred without an adjudication of guilt.

History

Enacted by Acts 1985, 69th Leg., ch. 211 (S.B. 616), § 1, effective January 1, 1986; am. *Acts 1987, 70th Leg., ch. 54 (S.B. 280), § 23*, effective September 1, 1987; am. *Acts 1991, 72nd Leg., ch. 16 (S.B. 232), § 6.02*, effective August 26, 1991; am. Acts 1993, 73rd Leg., ch. 916 (H.B. 74), § 27, effective September 1, 1993; am. Acts 1997, 75th Leg., ch. 850 (H.B. 1001), § 2, effective September 1, 1997; am. Acts 2007, 80th Leg., ch. 614 (H.B. 417), § 23, effective September 1, 2007; am. Acts 2011, 82nd Leg., ch. 744 (H.B. 1226), § 2, effective June 17, 2011.

Tex. Elec. Code § 13.001

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End of Document

Tex. Elec. Code § 13.002

This document is current through the 2019 Regular Session, 86th Legislature, and 2019 election results.

Texas Statutes & Codes Annotated by LexisNexis \otimes > Election Code > Title 2 Voter Qualifications and Registration (Chs. 11 — 20) > Chapter 13 Application for Registration; Initial Registration (Subchs. A — F) > Subchapter A Eligibility; Manner of Applying for Registration (§§ 13.001 — 13.030)

Notice

This section has more than one version with varying effective dates.

Sec. 13.002. Application Required. [Effective until January 1, 2021]

- (a)A person desiring to register to vote must submit an application to the registrar of the county in which the person resides. Except as provided by Subsection (e), an application must be submitted by personal delivery, by mail, or by telephonic facsimile machine in accordance with Sections 13.143(d) and (d-2).
- **(b)**A registration application must be in writing and signed by the applicant.
- **(c)**A registration application must include:
 - (1) the applicant's first name, middle name, if any, last name, and former name, if any;
 - (2)the month, day, and year of the applicant's birth;
 - (3) a statement that the applicant is a United States citizen;
 - (4) a statement that the applicant is a resident of the county;
 - (5) a statement that the applicant has not been determined by a final judgment of a court exercising probate jurisdiction to be:
 - (A)totally mentally incapacitated; or
 - **(B)**partially mentally incapacitated without the right to vote;
 - (6) a statement that the applicant has not been finally convicted of a felony or that the applicant is a felon eligible for registration under Section 13.001;
 - (7)the applicant's residence address or, if the residence has no address, the address at which the applicant receives mail and a concise description of the location of the applicant's residence;
 - **(8)**the following information:
 - (A)the applicant's Texas driver's license number or the number of a personal identification card issued by the Department of Public Safety;

- (**B**)if the applicant has not been issued a number described by Paragraph (A), the last four digits of the applicant's social security number; or
- (C) a statement by the applicant that the applicant has not been issued a number described by Paragraph (A) or (B);
- (9)if the application is made by an agent, a statement of the agent's relationship to the applicant; and
- (10)the city and county in which the applicant formerly resided.
- (d) The omission of the applicant's middle or former name under Subsection (c)(1) or the applicant's zip code under Subsection (c)(7) does not affect the validity of a registration application, and the registrar may not reject the application because of that omission.
- (e)A person who is certified for participation in the address confidentiality program administered by the attorney general under Subchapter C, Chapter 56, Code of Criminal Procedure, is not eligible for early voting by mail under Section 82.007 unless the person submits an application under this section by personal delivery. The secretary of state may adopt rules to implement this subsection.
- (f)Instead of the statement required by Subsection (c)(5), an applicant who has been determined to be partially mentally incapacitated without the right to vote by a court and who is eligible to register because of Section 1.020(b) shall include in the application a statement that the person's guardianship has been modified to include the right to vote or the person's mental capacity has been completely restored, as applicable, by a final judgment of a court.
- (g)Instead of the statement required by Subsection (c)(5), an applicant who has been determined to be totally mentally incapacitated by a court and who is eligible to register because of Section 1.020(a) shall include in the application a statement that the person's mental capacity has been completely restored by a final judgment of a court.
- (h)The submission of a federal postcard application constitutes an application for registration under this section at the voting residence address stated on the application. This subsection does not apply to a person who indicates on the person's federal postcard application that the person is residing outside the United States indefinitely. The secretary of state shall prescribe rules to implement this subsection, including:
 - (1)rules providing directions to court clerks regarding the inclusion on jury lists of persons who submit federal postcard applications; and
 - (2)rules relating to whether a person who submits a federal postcard application is to be considered a registered voter of the applicable authority for the purposes of determining the number of signatures required on a petition.
- (i)An applicant who wishes to receive an exemption from the requirements of Section 63.001(b) on the basis of disability must include with the person's application:
 - (1)written documentation:
 - (A) from the United States Social Security Administration evidencing the applicant has been determined to have a disability; or
 - **(B)**from the United States Department of Veterans Affairs evidencing the applicant has a disability rating of at least 50 percent; and

(2) a statement in a form prescribed by the secretary of state that the applicant does not have a form of identification acceptable under Section 63.0101.

History

Enacted by Acts 1985, 69th Leg., ch. 211 (S.B. 616), § 1, effective January 1, 1986; am. Acts 1987, 70th Leg., ch. 436 (S.B. 1441), § 1, effective September 1, 1987; am. Acts 1987, 70th Leg., ch. 920 (H.B. 613), § 1, effective September 1, 1987; am. Acts 1987, 70th Leg., ch. 920 (H.B. 613), § 1, effective September 1, 1987; am. Acts 1989, 71st Leg., ch. 2 (S.B. 221), § 7.02, effective August 28, 1989; am. Acts 1993, 73rd Leg., ch. 916 (H.B. 74), § 30(c), effective September 1, 1993; am. Acts 1995, 74th Leg., ch. 390 (H.B. 1914), § 1, effective September 1, 1995; am. Acts 1995, 74th Leg., ch. 797 (H.B. 127), § 2, effective September 1, 1995; am. Acts 1997, 75th Leg., ch. 454 (S.B. 500), § 1, effective September 1, 1997; am. Acts 2003, 78th Leg., ch. 1315 (H.B. 1549), § 1, effective January 1, 2004; am. Acts 2005, 79th Leg., ch. 1049 (H.B. 1268), § 1, effective January 1, 2006; am. Acts 2007, 80th Leg., ch. 614 (H.B. 417), § 24, effective September 1, 2007; am. Acts 2007, 80th Leg., ch. 1295 (S.B. 74), § 4, effective June 15, 2007; am. Acts 2009, 81st Leg., ch. 87 (S.B. 1969), § 27.001(11), effective September 1, 2009; am. Acts 2009, 81st Leg., ch. 91 (H.B. 536), § 1, effective September 1, 2009; am. Acts 2009, 81st Leg., ch. 91 (H.B. 536), § 1, effective September 1, 2009; am. Acts 2009, 81st Leg., ch. 148), § 1, effective June 19, 2009; am. Acts 2011, 82nd Leg., ch. 123 (S.B. 14), § 1, effective January 1, 2012; am. Acts 2013, 83rd Leg., ch. 1178 (S.B. 910), § 2, effective September 1, 2013.

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End of Document

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Texas Statutes & Codes Annotated by LexisNexis® > Election Code > Title 2 Voter Qualifications and Registration (Chs. 11-20) > Chapter 13 Application for Registration; Initial Registration (Subchs. A-F) > Subchapter C Action On Application By Registrar (§§ 13.071 — 13.100)

Sec. 13.071. Review of Application.

- (a) The registrar shall review each submitted application for registration to determine whether it complies with Section 13.002 and indicates that the applicant is eligible for registration.
- (b) The registrar shall make the determination not later than the seventh day after the date the application is submitted to the registrar.

History

Enacted by Acts 1985, 69th Leg., ch. 211 (S.B. 616), § 1, effective January 1, 1986.

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Texas Statutes & Codes Annotated by LexisNexis® > Election Code > Title 2 Voter Qualifications and Registration (Chs. 11-20) > Chapter 13 Application for Registration; Initial Registration (Subchs. A-F) > Subchapter C Action On Application By Registrar (§§ 13.071 — 13.100)

Sec. 13.072. Action on Application.

- (a)Unless the registrar challenges the applicant, the registrar shall approve the application if:
 - (1)the registrar determines that an application complies with Section 13.002 and indicates that the applicant is eligible for registration; and
 - (2) for an applicant who has not included a statement described by Section 13.002(c)(8)(C), the registrar verifies with the secretary of state:
 - (A)the applicant's Texas driver's license number or number of a personal identification card issued by the Department of Public Safety; or
 - (**B**)the last four digits of the applicant's social security number.
- (b)After approval of an application by an applicant who was registered in another county at the time of application, the registrar shall deliver written notice of the applicant's change of residence to the other county's registrar and include in the notice the applicant's name, former residence address, and former registration number, if known.
- (c)Except as provided by Subsection (d), if the registrar determines that an application does not comply with Section 13.002 or does not indicate that the applicant is eligible for registration, the registrar shall reject the application.
- (d) If an application clearly indicates that the applicant resides in another county, the registrar shall forward the application to the other county's registrar not later than the second day after the date the application is received and, if the other county is not contiguous, shall deliver written notice of that action to the applicant not later than the seventh day after the date the application is received. The date of submission of a completed application to the wrong registrar is considered to be the date of submission to the proper registrar for purposes of determining the effective date of the registration.
- (e)[Repealed by Acts 2003, 78th Leg., ch. 1316 (H.B. 1695), § 44, effective September 1, 2003.]

History

Enacted by Acts 1985, 69th Leg., ch. 211 (S.B. 616), § 1, effective January 1, 1986; am. Acts 1989, 71st Leg., ch. 415 (H.B. 1563), § 1, effective September 1, 1989; am. Acts 1991, 72nd Leg., ch. 559 (H.B. 879), § 1, effective September 1, 1991; am. Acts 1997, 75th Leg., ch. 1349 (H.B. 331), § 4, effective September 1, 1997; am. Acts 2003, 78th Leg., ch. 1316 (H.B. 1695), §§ 5, 44, effective September 1, 2003; am. Acts 2005, 79th Leg., ch. 1105 (H.B. 2280), § 1, effective January 1, 2006.

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Texas Statutes & Codes Annotated by LexisNexis® > Election Code > Title 2 Voter Qualifications and Registration (Chs. 11-20) > Chapter 13 Application for Registration; Initial Registration (Subchs. A-F) > Subchapter C Action On Application By Registrar (§§ 13.071 — 13.100)

Sec. 13.074. Challenge of Applicant.

- (a) If after determining that an application complies with Section 13.002 and indicates that the applicant is eligible for registration, the registrar has reason to believe the applicant is not eligible for registration or the application was submitted in an unauthorized manner, the registrar shall challenge the applicant.
- (b) The registrar shall indicate on the application of a challenged applicant that the applicant's eligibility or the manner of submission of the application has been challenged and the date of the challenge.
- (c) The registrar may not challenge an applicant later than the second day after the date the application is determined to comply with Section 13.002 and indicate that the applicant is eligible for registration.

History

Enacted by Acts 1985, 69th Leg., ch. 211 (S.B. 616), § 1, effective January 1, 1986.

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Texas Statutes & Codes Annotated by LexisNexis® > Election Code > Title 2 Voter Qualifications and Registration (Chs. 11-20) > Chapter 16 Cancellation of Registration (Subchs. A-D) > Subchapter B Cancellation (§§ 16.031-16.060)

Sec. 16.033. Cancellation Following Investigation by Registrar.

- (a) The registrar may use any lawful means to investigate whether a registered voter is currently eligible for registration in the county. This section does not authorize an investigation of eligibility that is based solely on residence.
- (b)If the registrar has reason to believe that a voter is no longer eligible for registration, the registrar shall deliver written notice to the voter indicating that the voter's registration status is being investigated by the registrar. The notice shall be delivered by forwardable mail to the mailing address on the voter's registration application and to any new address of the voter known to the registrar. If the secretary of state has adopted or recommended a form for a written notice under this section, the registrar must use that form.
- **(c)**The notice must include:
 - (1) a request for information relevant to determining the voter's eligibility for registration; and
 - (2)a warning that the voter's registration is subject to cancellation if the registrar does not receive an appropriate reply on or before the 30th day after the date the notice is mailed.
- (d)Except as provided by Subsection (e), the registrar shall cancel a voter's registration if:
 - (1) after considering the voter's reply, the registrar determines that the voter is not eligible for registration;
 - (2) no reply is received from the voter on or before the 30th day after the date the notice is mailed to the voter under Subsection (b); or
 - (3)each notice mailed under Subsection (b) is returned undelivered to the registrar with no forwarding information available.
- (e)A voter's registration may not be canceled under Subsection (d) if the voter's name appears on the suspense list unless the notice mailed to the voter indicated that the registrar had reason to believe that the voter is not eligible for registration because of a ground other than a ground based on residence.
- (f)The registrar shall retain a copy of the notice mailed to a voter under this section on file with the voter's registration application. If the voter's reply to the notice is in writing, the registrar shall also retain the reply on file with the application. If the reply is oral, the registrar shall prepare a memorandum of the reply, indicating the substance and date of the reply, and shall retain the memorandum on file with the application.

History

Enacted by Acts 1985, 69th Leg., ch. 211 (S.B. 616), § 1, effective January 1, 1986; am. Acts 1995, 74th Leg., ch. 797 (H.B. 127), § 18, effective September 1, 1995; am. Acts 2003, 78th Leg., ch. 1316 (H.B. 1695), § 8, effective September 1, 2003; am. Acts 2013, 83rd Leg., ch. 1093 (H.B. 3593), § 1, effective September 1, 2013.

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Texas Statutes & Codes Annotated by LexisNexis® > Election Code > Title 16 Miscellaneous Provisions (Chs. 271 — 279) > Chapter 273 Criminal Investigation and Other Enforcement Proceedings (Subchs. A - E) > Subchapter D Mandamus By Appellate Court (§§ 273.061 — 273.080)

Sec. 273.061. Jurisdiction.

The supreme court or a court of appeals may issue a writ of mandamus to compel the performance of any duty imposed by law in connection with the holding of an election or a political party convention, regardless of whether the person responsible for performing the duty is a public officer.

History

Enacted by Acts 1985, 69th Leg., ch. 211 (S.B. 616), § 1, effective January 1, 1986.

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Petition for Writ of Mandamus Dismissed and Memorandum Opinion filed October 8, 2020.



In The

Fourteenth Court of Appeals

NO. 14-20-00685-CV

IN RE JUAN GERARDO PEREZ PICHARDO AND PUBLIC INTEREST LEGAL FOUNDATION, INC., Relators

ORIGINAL PROCEEDING WRIT OF MANDAMUS Harris County, Texas

MEMORANDUM OPINION

On September 28, 2020, relators Juan Gerardo Perez Pichardo ("Pichardo") and Public Interest Legal Foundation, Inc. (the "Foundation") filed a petition for writ of mandamus in this court. *See* Tex. Elec. Code § 273.061; *see also* Tex. R. App. P. 52.

According to the petition, Pichardo is a registered voter in Harris County, Texas.

According to the petition, the Foundation is a nonpartisan, public interest organization incorporated and based in Indianapolis, Indiana. The Foundation's mission is to promote the integrity of elections nationwide through research, education, remedial programs, and litigation. The Foundation also seeks to ensure that voter qualification laws and election administration procedures are followed.

The respondent is Ann Harris Bennett, in her capacity as the Voter Registrar for Harris County, Texas ("Bennett"). Relators argue that they are entitled to mandamus relief because Bennett allegedly is failing to perform her ministerial duty to reject and challenge all voter registration applications that do not contain a "YES" answer to the question "Are you a United States citizen?"

Relators ask this court to compel Bennett to:

- 1. Review all new voter registration applications received for compliance with Election Code Section 13.002(c)(3);
- 2. Reject any application that contains a "NO" answer to the citizenship question or does not answer "YES" to the citizenship question;
- 3. Review all previously filed applications of registered voters, or permit the Foundation to review them, and initiate challenge procedures for any registrant who has not submitted an application that contains a "YES" answer to the citizenship question;
- 4. Review all previously filed applications of registered voters, or permit the Foundation to review them, and initiate challenge procedures for any registrant who has submitted an application that contains a "NO" answer to the citizenship question; and
- 5. Report findings of any such review to this court and to the Secretary of State of Texas.

Before we can reach the merits of relators' petition, we first must determine whether relators have standing to bring this original proceeding. *In re Hotze*, No.

14-08-00421-CV, 2008 WL 4380228, at *1 (Tex. App.—Houston [14th Dist.] July 10, 2008, no pet.) (per curiam) (mem. op.). The relators' standing is an element of our subject-matter jurisdiction. *Tex. Ass'n of Bus. v. Tex. Air Control Bd.*, 852 S.W.2d 440, 443–44 (Tex. 1993). Subject-matter jurisdiction is never presumed, and lack of subject-matter jurisdiction is fundamental error that cannot be waived. *Id.* When we sua sponte review a party's standing, we construe the petition in favor of the party and, if necessary, review the entire record to determine if any evidence supports standing. *Id.* at 446. Standing is a constitutional prerequisite to obtaining judicial relief, and courts have no subject-matter jurisdiction over and therefore must dismiss claims made by parties who lack standing to assert them. *See Heckman v. Williamson Cty.*, 369 S.W.3d 137, 150 (Tex. 2012).

REQUIREMENTS FOR STANDING

Relators seeks mandamus relief under section 273.061 of the Election Code, which provides:

The supreme court or a court of appeals may issue a writ of mandamus to compel the performance of any duty imposed by law in connection with the holding of an election or a political party convention, regardless of whether the person responsible for performing the duty is a public officer.

Tex. Elec. Code § 273.061. To have standing under section 273.061, a party must demonstrate that it "possesses an interest in a conflict distinct from that of the general public, such that the defendant's actions have caused the plaintiff some particular injury." *In re Kherkher*, 604 S.W.3d 548, 553 (Tex. App.—Houston [14th Dist.] 2020, orig. proceeding) (quoting *Williams v. Lara*, 52 S.W.3d 171, 178 (Tex. 2001)). The claimant must show a particularized injury beyond that of the general public. *Id.* "Our

decisions have always required a plaintiff to allege some injury distinct from that sustained by the public at large." *Brown v. Todd*, 53 S.W.3d 297, 302 (Tex. 2001). "No Texas court has ever recognized that a plaintiff's status as a voter, without more, confers standing to challenge the lawfulness of governmental acts." *Id.* For example, a voter lacks standing to seek the removal of an ineligible candidate from the ballot because the voter has no special interest. *See e.g.*, *Clifton v. Walters*, 308 S.W.3d 94, 99 (Tex. App.—Fort Worth 2010, pet. denied); *Brimer v. Maxwell*, 265 S.W.3d 926, 928 (Tex. App.—Dallas 2008, no pet.).

RELATORS' FAILURE TO SHOW STANDING

Pichardo argues that he has standing to obtain mandamus relief under section 273.061 because, unless Bennet is compelled to comply with the Election Code, he is at risk of having his vote canceled out by an ineligible vote. But that alleged harm is true of every member of the general public who is registered to vote. Pichardo lacks standing because he has not shown that he has an interest or a particularized injury that is distinct from that of the general public. *See e.g.*, *Brown*, 53 S.W.3d at 302; *In re Kherkher*, 604 S.W.3d at 553.

The Foundation argues that it is harmed or injured by Bennett's alleged noncompliance with the Election Code because Bennett's noncompliance has impaired and will continue to impair it from carrying out its mission to promote election integrity and compliance with federal and state statutes that ensure the integrity of elections. The Foundation alleges it has diverted resources and incurred substantial costs to obtain Registrar Bennett's voter list maintenance records and monitor her compliance with the Election Code, and that absent relief, it will be forced to divert additional resources. The Foundation lacks standing because it has not shown that it has an interest or a

particularized injury that is distinct from that of the general public. See e.g., In re Kherkher, 604 S.W.3d at 553. The mere fact that the Foundation has incurred expenses and legal fees to bring this litigation does not establish a particularized injury that is sufficient to confer standing to bring an action under section 273.061 of the Election Code. The Foundation cites no authority that supports its standing argument.

CONCLUSION

Because relators have not shown that they have standing to seek mandamus relief under section 273.061 of the Election Code, this court lacks subject-matter jurisdiction. We therefore dismiss relators' petition for writ of mandamus for lack of jurisdiction.¹

PER CURIAM

Panel consists of Justices Spain, Hassan, and Poissant.

¹ Additionally, the election is already underway. The Harris County Clerk has represented to the Texas Supreme Court that his office would accept mail-in ballots beginning September 24. *In re Hotze*, No. 20-0430 (Tex. Oct. 7, 2020), available at https://www.txcourts.gov/media/1449868/200739.pdf. "The United States Supreme Court has repeatedly warned against judicial interference in an election that is imminent or ongoing." *Id*. (citations omitted).

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