

No. 03-17-00662-CV

IN THE COURT OF APPEALS  
FOR THE \_\_\_\_\_ JUDICIAL DISTRICT  
AUSTIN, TEXAS

FILED IN  
3rd COURT OF APPEALS  
AUSTIN, TEXAS  
10/10/2017 4:11:02 PM  
JEFFREY D. KYLE  
Clerk

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**IN RE**  
**ROLANDO PABLOS, SECRETARY OF STATE FOR THE STATE OF TEXAS AND KEITH INGRAM, TEXAS ELECTIONS DIVISION OF THE SECRETARY OF STATE,**  
*RELATORS,*

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**PETITION FOR WRIT OF MANDAMUS**  
(Oral Argument Requested)

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Original Proceeding to Cause No. D-1-GN-17-003451  
Pending in the 98<sup>th</sup> Judicial District Court  
Travis County, Texas,  
Honorable Timothy Sulak, Presiding

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**RECORD INDEX<sup>1</sup>**

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Velva L. Price  
District Clerk  
Travis County  
D-1-GN-17-003451  
Carrisa Escalante

No. **D-1-GN-17-003451**

LEAGUE OF WOMEN VOTERS OF TEXAS, § IN THE DISTRICT COURT  
TEXAS STATE CONFERENCE OF THE §  
NATIONAL ASSOCIATION FOR THE §  
ADVANCEMENT OF COLORED PEOPLE §  
(NAACP) and RUTHANN GEER, §

*Plaintiffs,*

vs.

ROLANDO PABLOS, Secretary of State For the §  
State of Texas, and KEITH INGRAM, Director, §  
Texas Elections Division of the Secretary of State, §

*Defendants.*

TRAVIS COUNTY, TEXAS

**98TH** JUDICIAL DISTRICT

**PLAINTIFFS’ ORIGINAL PETITION FOR DECLARATORY RELIEF**

COME NOW the Plaintiffs, LEAGUE OF WOMEN VOTERS OF TEXAS, TEXAS STATE CONFERENCE OF THE NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE (NAACP), and RUTHANN GEER, and for their cause of action against the Defendants, ROLANDO PABLOS, Secretary of State for the State of Texas; and KEITH INGRAM, Director, Texas Elections Division, allege:

**THE PARTIES**

1. Plaintiff, the League of Women Voters of Texas (the “League”), is a nonpartisan, nonprofit organization founded in 1919 whose primary place of business is in Travis County, Texas.

2. Plaintiff, the Texas State Conference of the National Association for the Advancement of Colored People (the “NAACP”), is a nonpartisan, nonprofit organization chartered in 1940, whose primary place of business is in Travis County, Texas.

3. Plaintiff, Ruthann Geer is an instructor of government at Tarrant County College and a resident of Burleson, Texas. She serves as chair of the Statewide Nominating Committee of the League of Women Voters of Texas in a volunteer capacity, and formerly served as president.

4. Defendant Rolando Pablos, is the Secretary of State for the State of Texas, and may be served with process by Certified U.S. Mail, return receipt requested, at Texas Secretary of State, P.O. Box 12887, Austin, Texas 78711-2887.

5. Defendant Keith Ingram is the Director of the Elections Division of the Secretary of State, and may be served with process by Certified U.S. Mail, return receipt requested, at Elections Division, Secretary of State, P.O. Box 12060, Austin, Texas 78711-2060.

### **JURISDICTION AND VENUE**

6. This Court has jurisdiction over this action and the requested relief sought under Tex. Civ. Prac. & Rem. Code §§ 37.003 and 65.011.

7. Venue in this Court is proper under Tex. Civ. Prac. & Rem. Code § 15.002(a)(1) and (a)(3) in as much as a substantial part of the events or omissions

giving rise to the claim occurred in Travis County and the Defendants' principal office is in Travis County.

### **DISCOVERY**

8. Discovery is intended to be conducted under a Level 2 Discovery Control Plan, as set forth in Rule 190.3 of the Texas Rules of Civil Procedure.

### **INTRODUCTION**

9. This lawsuit seeks to prevent the Texas Secretary of State and Texas Elections Division from producing information from the State's computerized voter registration files to the Presidential Advisory Commission on Election Integrity (the "PACEI" or "Commission"), or any member or officer thereof, in a manner that does not comply with State law and that can harm millions of registered Texas voters.

10. In the aftermath of his unsubstantiated claim that "millions of people . . . voted illegally" in the 2016 presidential election<sup>1</sup>, President Donald Trump signed Executive Order No. 13,799, which established the Commission. The Commission's stated mission is to "study the registration and voting processes used in Federal elections," and to issue a report that addresses, *inter alia*, (i) "those laws, rules, policies, activities, strategies, and practices" that either "enhance" or "undermine the American people's confidence in the integrity of the voting

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<sup>1</sup> Donald Trump (@realDonaldTrump), Twitter (Nov. 27, 2016, 12:30 PM), <https://twitter.com/realdonaldtrump/status/802972944532209664?lang=en>

processes used in Federal elections;” and (ii) “vulnerabilities in voting systems and practices used for Federal elections that could lead to improper voter registrations and improper voting, including fraudulent voter registrations and fraudulent voting.” Exec. Order No. 13,799, 82 Fed. Reg. 22,389 (May 16, 2017).

11. On June 28, 2017, the Commission sent letters to all 50 states (and the District of Columbia), including Texas, seeking a wide range of information pertaining to each state’s voters, including name, address, demographic information, partial social security numbers, party affiliations, criminal felony convictions, registration and voting histories, and more. In doing so, the Commission clearly stated that any information sent to it would become public. The Commission initially requested that Texas and the other states respond by July 14, 2017.

12. The information sought by the Commission is not widely available in Texas, but instead may be released only under certain circumstances and conditions imposed by Texas’s voting laws. Tex. Elec. Code § 18.066. Individuals and entities, like the Commission, seeking large-scale voter information are only permitted to access certain data contained in Texas’s computerized voter registration files and only upon certain conditions. Tex. Elec. Code § 18.066(b).

13. Specifically, requesting individuals or entities may obtain the limited, redacted information from the voter files only after (i) they pay a fee and (ii) they execute a notarized affidavit with the Elections Division of the Secretary of State's Office ("Elections Division") stating that they will not use the data in certain enumerated, proscribed ways. *See* Tex. Elec. Code § 18.066. In particular, the affidavit from the requesting party must state "that the person will not use the information obtained in connection with advertising or promoting commercial products or services." Tex. Elec. Code § 18.066(d).

14. On June 30, 2017, Texas Secretary of State Rolando Pablos (the "Secretary of State" or "Secretary") issued a statement regarding the Commission's request, stating:

The Secretary of State's office will provide the Election Integrity Commission with public information and will protect the private information of Texas citizens while working to maintain the security and integrity of our state's elections system.<sup>2</sup>

In doing so, the Secretary indicated that he will provide the Commission with the computerized voter file fields, including the full names of all registrants (including middle names or initials), addresses of most registrants, dates of birth, voting history from 2006 onward, active/inactive status and whether a voter's registration

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<sup>2</sup> *See* Lauren McGaughy, *Texas Won't Release Private Voter Info to Trump Administration*, Dallas News, June 30, 2017, <https://www.dallasnews.com/news/elections/2017/06/30/texas-will-releasevoters-private-info-trump-election-commission>.

has been canceled, voting method (absentee, provisional, early), the party primaries that the voter participated in, and the registration effective date.

15. The Defendants' provision of the data requested by the Commission, even if cabined to information generally available to candidates or other organizations who are entitled to request voter information under Texas law, would undermine, and run afoul of, the State's carefully-crafted regulation of the use of voter data.

16. *First*, based on the Secretary's public statement, it appears that the Defendants intend to disclose information from the State's computerized voter list without a prior affidavit limiting further transmission or dissemination. Indeed, the Secretary's statement makes no mention of the legal requirement for the Commission to first execute an affidavit stating it "will not use the information obtained in connection with advertising or promoting commercial products or services," Tex. Elec. Code § 18.066(d), implying that no such affidavit will be required. Disclosure of voter information absent such an affidavit would directly contravene the requirements of Tex. Elec. Code §§ 18.066(d) and 18.067.

17. *Second*, even if the Commission were to submit a notarized affidavit stating that the information would not be used for commercial purposes—and there is no indication that the Commission has done so or is willing to do so—the Commission's stated intention of publishing otherwise private voter data would

enable widespread abuse of that information to the detriment of Texas citizens. In that circumstance, the affidavit would be a meaningless promise, for once the information is public, neither the Commission nor the Defendants can possibly provide assurances as to its use.

18. *Third*, neither the Defendants nor the Commission have indicated whether the Commission will comply with the Secretary's published procedures for providing voter information to the public. Under those procedures, requests for voter information usually require a deposit and payment subject to a schedule of fees released by the Secretary. *See Voter Registration Public Information Request Form*, Texas Secretary of State, <https://www.sos.state.tx.us/elections/forms/pi.pdf> (last visited July 17, 2017). Allowing the Commission to receive the information without paying the fee or deposit undermines those individuals or entities who have legitimately obtained the information by submitting a deposit and remitting the required fee. At a minimum, the Commission should not receive special treatment.

19. *Fourth*, with specific regard to the Commission's request for voter birth dates, the Commission's request (and the Defendants' compliance) threatens the privacy interests of Plaintiffs and other Texas voters. As Texas courts have acknowledged, a citizen has an inherent privacy interest in his or her birth date, given that such date, in combination with other information that the Defendants

intend to make available, can result in identity theft. It is for that reason that Texas courts have held that the disclosure of birth date information constituted a “clearly unwarranted invasion of personal privacy.”

20. Providing the requested information to the Commission would make an end-run around Texas’s important restrictions on any secondary dissemination of received voter information. Once the information requested by the Commission is made publicly available (which the Commission has admitted it will do), the genie cannot be put back in the bottle.

21. As a result, Plaintiffs request that the Court enter declaratory and injunctive relief preventing the Defendants from releasing the voter registration information sought by the Commission absent the execution of an affidavit, a guarantee that the information will not be further disseminated in violation of the affidavit, and remittance of the applicable fees and deposits to which all other individuals and/or entities are subject.

### **STANDING OF THE PARTIES**

22. Plaintiff, the League of Women Voters of Texas (the “League”), is a nonpartisan, nonprofit organization founded in 1919 and based in Austin, Texas. The vast majority of the over 2,000 members of the League are residents of Texas who are registered to vote in Texas and whose information is contained in Texas’s

Computerized Voter Registration List (the “Voter List”) which will be released by the Defendants to the Commission.

23. The League has standing to challenge the Defendants’ release of the Voter List on behalf of its members. The League has members who will be directly impacted and harmed by the release of the Voter List information to the Commission. The Voter List contains personal information regarding Texas voters’ identities, which may be used to solicit, harass, or otherwise infringe upon the privacy of Texas voters, including the League’s members.

24. The League also has standing to challenge the Defendants’ release of the Voter List on its own behalf. By producing information to the Commission—which has indicated that it will make any documents that are submitted to the Commission available to the public, which may be compelled under Federal Law in any event—the Defendants will impair the privacy of the League’s members, including members that the League assisted in registering to vote. It will also make it substantially more difficult for the League to engage in voter-registration and get-out-the-vote activities, which they regularly perform in support of their civic-engagement mission. Voters and prospective voters will be more reluctant to participate in elections or register to vote in the future if they understand that the Defendants are willing to provide information on the Voter List to entities who openly admit that they intend to make such information public. The public

disclosure of such personal information will chill League members' as well as other voters' and prospective voters' exercise of First Amendment rights including the right to vote and freedom of association.

25. Last year, the League, through its twenty-five local chapters, conducted at least two hundred voter registration drives. The League also encouraged and assisted individuals in voting and conducted other activities to boost civic engagement, which has been essential to its mission since its founding. If the Defendants provide the Commission with the Voter List, some portion of the League's funds that would have gone to voter registration, get-out-the-vote, and civic engagement will be redirected to ameliorating the consequences of the Defendants' action, including educating voters regarding the Commission and the State's privacy laws. Furthermore, additional expenses may be incurred by the League as it responds to fallout from the release of Texans' personal information, including (but not limited to) voter education efforts, political activism, and litigation. Thus, the League will be forced to divert time, money, and resources from their other activities in order to expend more time and attention educating and assisting Texas citizens with regard to the protection (or, in this case, non-protection) of their personal information.

26. Plaintiff, the Texas State Conference of the National Association for the Advancement of Colored People (the "NAACP"), is a nonpartisan, nonprofit

organization chartered in 1936 and currently based in Austin, Texas. The majority of the over 10,000 members of the NAACP are residents of Texas who are registered to vote in Texas and whose information is contained in the Voter List which will be released by the Defendants to the Commission.

27. The NAACP has standing to challenge the Defendants' release of the Voter List on behalf of its members. The NAACP has members who will be directly impacted and harmed by the release of the Voter List information to the Commission. The Voter List contains personal information regarding Texas voters' identities, which may be used to solicit, harass, or otherwise infringe upon the privacy of Texas voters, including the NAACP's members.

28. The NAACP also has standing to challenge the Secretary's release of the Voter List on its own behalf. By producing information to the Commission—which has publicly stated it will make any documents that are submitted to the Commission available to the public—the Secretary will impair the privacy of the NAACP's members, including members that the NAACP assisted in registering to vote. It will also make it substantially more difficult for the NAACP to engage in voter-registration and get-out-the-vote activities, which they regularly perform in support of their civic-engagement mission. Voters and prospective voters will be more reluctant to participate in elections or register to vote in the future if they understand that the Secretary is willing to provide information on the Voter List to

entities who openly admit that they intend to make such information public. The public disclosure of such personal information will chill NAACP members' as well as other voters' and prospective voters' exercise of First Amendment rights including the right to vote and freedom of association.

29. Last year, the NAACP, through its more than eighty local branches and college chapters, conducted numerous voter registration drives. Following the voter registration deadline, the NAACP helped get voters to the polls, including by providing rides to voting locations. If the Defendants provides Voter List information to the Commission, some portion of the NAACP's funds that would have gone to voter registration, get-out-the-vote, and civic engagement will be redirected to ameliorating the consequences of the Secretary's action. Furthermore, additional expenses may be incurred by the NAACP as it responds to fallout from the release of Texans' personal information, including (but not limited to) voter education efforts, political activism, and litigation. Thus, the NAACP will be forced to divert time, money, and resources from their other activities in order to expend more time and attention educating and assisting Texas citizens with regard to the protection (or, in this case, non-protection) of their personal information.

30. Plaintiff Ruthann Geer is an instructor of government at Tarrant County College and a resident of Burleson, Texas. She serves as chair of the

Statewide Nominating Committee of the League of Women Voters of Texas in a volunteer capacity, and formerly served as president. Ms. Geer is active in voter registration efforts. She is a registered voter and has consistently participated in Texas elections. On information and belief, Ms. Geer's name and information appears in Texas's Voter List. As such, her personal information will be released by the Defendants to the Commission. The release of such personal information will infringe on Ms. Geer's privacy rights. Furthermore, the public disclosure of such personal information could expose Ms. Geer to intimidation or harassment for merely exercising her right to vote, and may chill her exercise of First Amendment rights including the right to vote and freedom of association. Ms. Geer believes that her unique name and address make her particularly easy to identify and thus susceptible to such harassment, even with the release of limited information. Additionally, Ms. Geer believes that the release of this information will make her students, who already fear disclosure of who they vote for, even more reluctant to register and vote. As a result, Ms. Geer has standing to bring this action individually.

31. Defendant Rolando Pablos is the duly appointed Secretary of State of Texas. He is sued only in his official capacity, and not personally. As Secretary of State, Secretary Pablos has responsibilities over a number of areas, including oversight of elections and the maintenance of state records—including more than

14 million voter registration records. *See Constitutional Duties*, Texas Secretary of State, <https://www.sos.state.tx.us/about/duties.shtml> (last visited July 17, 2017). With regard to elections, Secretary Pablos is Texas’s Chief Elections official and is responsible for maintaining and overseeing appropriate requests for access to the Voter List. Tex. Elec. Code §§ 18.061, 18.066, and 31.001; *see* <https://www.sos.state.tx.us/about/duties.shtml>.

32. Defendant Keith Ingram is the Director of the Texas Elections Division, appointed by the Governor of Texas. He is sued only in his official capacity, and not personally. With regard to elections, Defendant Ingram oversees the Elections Division which is responsible for maintaining and overseeing appropriate requests for access to the Voter List. Tex. Elec. Code §§ 18.061, 18.066, and 31.001.

### **PLAINTIFFS’ CLAIM**

33. Plaintiffs reallege and incorporate all prior paragraphs of this Complaint.

#### ***The Commission and Its Request***

34. The Presidential Advisory Commission on Election Integrity was established on May 11, 2017 by Executive Order (“Commission Order”). *See* Exec. Order. No. 13,799, 82 Fed. Reg. 22,389 (May 16, 2017).

35. Although the Commission has the stated task of “study[ing] the registration and voting processes used in Federal elections,” *see id.*, the Commission does not have any authority to subpoena records, to undertake investigations, or to demand the production of state voter records from state election officials, including in Texas or anywhere else.

36. Nonetheless, on June 28, 2017, the Vice Chair of the Commission, Kansas Secretary of State Kris Kobach, sent a letter to all fifty states and the District of Columbia seeking detailed voter data from each jurisdiction. *See* Office of the Vice President, Readout of the Vice President’s Call with the Presidential Advisory Commission on Election Integrity (June 28, 2017), <https://www.whitehouse.gov/the-press-office/2017/06/28/readout-vice-presidents-call-presidential-advisory-commission-election> (“Vice Chair of the Commission and Kansas Secretary of State Kris Kobach told members a letter will be sent today to the 50 states and District of Columbia on behalf of the Commission requesting publicly-available data from state voter rolls and feedback on how to improve election integrity.”).

37. On information and belief, one of the Commission’s letters was sent to Defendant Pablos (the “Letter”). The Letter sought, *inter alia*, the following data from the Voter List:

[T]he full first and last names of all [Texas voter] registrants, middle names or initials if available, addresses, dates of birth, political party

(if recorded in your state), last four digits of social security number if available, voter history (elections voted in) from 2006 onward, active/inactive status, cancelled status, information regarding any felony convictions, information regarding voter registration in another state, information regarding military status, and overseas citizen information.

The Letter also asked Secretary Pablos to provide “evidence or information . . . regarding instances of voter fraud or registration fraud” and information on in-state “convictions for election-related crimes . . . since the November 2000 federal election.”

38. The Letter stated that “any documents that are submitted to the full Commission will also be made available to the public.”

39. By the plain terms of the Letter, the Commission requested that the Secretary provide the aforementioned Texas data by July 14, 2017.

40. On information and belief, in connection with a separate lawsuit pending in the U.S. District Court for the District of Columbia, on July 10, a federal officer working on behalf of the Commission notified election officials on behalf of the Commission, and requested a temporary hold on submitting data to the Commission. Plaintiffs are unaware of whether Defendants or any entity in Texas received this message.

### ***Texas’s Voter List and Distribution of Voter Data***

41. Texas requires citizens to register to vote in order to participate in state and federal elections within the state. Tex. Elec. Code § 11.002(a)(6).

42. The Texas voter registration form instructs prospective voters to provide at least the following information: name; residence and postal address; any previous voter registration address in Texas; Texas county of residence; date of birth; previous name (if applicable); driver's license number (if applicant possesses one) or last four digits of social security number (if no driver's license); and date of application for registration. Other information, including a voter's gender and telephone number, is requested on the form, but is optional. Furthermore, the application requires applicants to affirm that they: reside in the stated county and are a citizen of the United States; have not been finally convicted of a felony, or if a felon, have completed all punishment; and have not been determined by a court to be mentally incapacitated. The state's voter registration application can be located through a link on the Secretary's website. *See Voter Registration Application*, Texas Secretary of State, <http://www.sos.state.tx.us/elections/forms/vr-with-receipt.pdf> (last visited July 17, 2017).

43. The Director of the Elections Division, at the direction of the Secretary, is charged with implementing and maintaining "a statewide computerized voter registration list that serves as the single system for storing and managing the official list of registered voters in the state." Tex. Elec. Code § 18.061.

44. Under Texas and federal law “[t]he statewide computerized voter registration list must: (1) contain the name and registration information of each voter registered in the state; (2) assign a unique identifier to each registered voter; and (3) be available to any election official in the state through immediate electronic access.” Tex. Elec. Code § 18.061(b).

45. Texas further provides that the local voter registrar must electronically submit to the Secretary each voter participating in an election within thirty days of the election. This data “must include a notation of whether the voter voted on election day, voted early by personal appearance, [or] voted early by mail.” Tex. Elec. Code § 18.069.

46. Information on registered voters is not openly posted on the Internet and is generally not made available absent a specific request by an individual or entity. In the case of such a request, however, the Secretary is required to “furnish information in the statewide computerized voter registration list to any person on request not later than the 15th day after the date the request is received.” Tex. Elec. Code § 18.066(a).

47. Such request, however, is limited to certain information and must meet specific requirements.

48. First, the Secretary may not furnish (i) any voter’s social security number; or (ii) certain residential addresses. Tex. Elec. Code § 18.066(b).

49. *Second*, any request for voter information must be accompanied by “an affidavit to the secretary stating that the person will not use the information obtained in connection with advertising or promoting commercial products or services.” Tex. Elec. Code § 18.066(d). No data is to be furnished unless the affidavit is submitted to the Secretary.

50. The Director of the Elections Division requires the affidavit to be signed before a notary public. *See Voter Registration Public Information Request Form*, Texas Secretary of State, <https://www.sos.state.tx.us/elections/forms/pi.pdf> (last visited July 17, 2017).

51. In addition, use of the Voter List “in connection with advertising or promoting commercial products or services” is a Class A misdemeanor. Tex. Elec. Code § 18.067.

52. *Third*, Texas law authorizes the Secretary to collect fees when furnishing the Voter List. Tex. Elec. Code § 18.066(e). On information and belief, the Elections Division charges a minimum of \$93.75 for a CD-ROM containing the Voter List, and over \$1,000 for a list of the size of Texas’s registered voter population. *See Voter Registration Public Information Request Form*, Texas Secretary of State, <https://www.sos.state.tx.us/elections/forms/pi.pdf> (last visited July 17, 2017).

53. In addition, on information and belief, the Secretary requires that a \$75.00 deposit accompany each request for the Voter List information. *See Voter Registration Public Information Request Form*, Texas Secretary of State, <https://www.sos.state.tx.us/elections/forms/pi.pdf> (last visited July 17, 2017).

54. *Fourth*, Texas courts have recognized a “nontrivial privacy interest” in birth dates. *See Paxton v. City of Dallas*, No. 03-13-00546-CV, 2015 WL 3394061, at \*3 (Tex. App. May 22, 2015) (concluding that “public citizens have a privacy interest in their birth dates”), *review denied* (Sept. 4, 2015); *Tex. Comptroller of Pub. Accounts v. Att’y Gen. of Tex.*, 354 S.W.3d 336, 346-48 (Tex. 2010) (holding that disclosure of state employee birth dates constituted a “clearly unwarranted invasion of personal privacy”); *see also* Tex. Att’y Gen. Op. OR2017-06026 (2017) (“Based on *Texas Comptroller*, the court of appeals [in *City of Dallas*] concluded the privacy rights of public employees apply equally to public citizens, and thus, public citizens’ dates of birth are also protected by common-law privacy . . . .”). In doing so, courts have recognized the derivative harm arising from the release of information, including the threat that the disclosure of birth dates, along with other information, could be used for identity theft. Specifically, the Texas Supreme Court acknowledged in *Texas Comptroller* that the disclosure of “[birth] dates, when combined with name and place of birth, can reveal social security numbers.” 354 S.W.3d at 345.

*Texas's Provision of Data to the Commission*

55. On information and belief, neither the Commission nor any of its members has submitted a notarized affidavit to the Elections Division as required by Tex. Elec. Code § 18.066(d).

56. On information and belief, neither the Secretary nor members of the Elections Division have indicated that they will require the Commission or any of its members to execute a notarized affidavit with the Elections Division, as required by Tex. Elec. Code § 18.066(d) prior to the disclosure of any information from the Voter List.

57. On information and belief, neither the Commission nor any of its members has agreed that it will not use the information obtained in connection with advertising or promoting commercial products or services.

58. On information and belief, neither the Commission nor any of its members has explained to the Defendants, let alone offered any assurances or agreement, regarding how it will prevent third parties from using the Voter List information for advertising or promoting commercial products or services once the Voter List information is in the hands of the Commission.

59. On information and belief, neither the Commission nor any of its members has submitted the \$75.00 deposit or expressed a willingness to pay the schedule of fees announced by the Secretary and Elections Division.

60. On information and belief, neither the Secretary nor members of the Elections Division have indicated that they will require the Commission or any of its members to pay the fee for furnishing the Voter List pursuant to the Elections Division schedule of fees or require a deposit accompany the request.

61. On information and belief, the Secretary has acknowledged it will provide certain information to the Commission including voter names, addresses, dates of birth and registration, voting methods, voter status, and the elections (including primaries) in which specific voters have participated.

62. On information and belief, the Secretary has not yet released the Voter List (or any other data) to the Commission. In fact, on information and belief, on July 10, the Commission asked states, including Texas, to postpone their response to the Commission's Letter pending the resolution of a motion for temporary restraining order pending in U.S. District Court for the District of Columbia. However, on information and belief, once that motion is resolved, unless restrained by this Court's injunction, the Defendants will imminently release the Voter List (or a subset of information contained in the Voter List) to the Commission.

63. The disclosure of birth dates included in the Voter List would violate Texas law and the rights of Texas citizens.

64. Additionally, the Commission's intended use of the Voter List, as confirmed in the Commission's Letter itself, would violate Texas law and the rights of Texas citizens.

65. The Commission's Letter stated that "any documents that are submitted to the full Commission will also be made available to the public." The Commission therefore apparently intends to make information received from the Texas Voter List fully available to the public.

66. In a July 5 filing in a case in the District of Columbia, Mr. Kobach, the Vice Chair of the Commission, reaffirmed that there would be a "public release of documents," but asserted, without any explanation, that the voter roll data would be "de-identif[ied]." This assertion did not indicate which information from Texas's (or any other states') voter rolls would be made available to the public and which would not. Nonetheless, Mr. Kobach proffered, with no further explanation, that the "voter rolls themselves will not be released to the public by the Commission." Decl. of Kris W. Kobach at 3, *Elec. Privacy Info. Ctr. v. Presidential Advisory Comm'n on Election Integrity*, No. 1:17-cv-01320-CKK (D.D.C. July 5, 2017), ECF No. 8-1.

67. On information and belief, the Commission has not issued a formal communication to Texas state officials (or to the officials in any other state) that

contradicts the express language in the June 28 letter that the Voter List information received in response to that request would later be made public.

68. Moreover, even if the Commission itself intended to keep the voter information private, it is not clear that the Commission, which is an advisory committee covered under the Federal Advisory Committee Act (FACA), has the authority to prevent the dissemination of information provided to it. Rather, FACA requires advisory committees like the Commission to make available for public inspection all “the records, reports, . . . or other documents which were made available” to it unless those records fall within one of the enumerated exceptions. 5 U.S.C. App. 2 § 10(b). There is thus still a serious risk that, even if the Commission indicated that it did not intend to make any information provided to it public, the Voter List will still be made available, irrespective of any post-hoc assertions from Mr. Kobach.

69. The public dissemination of information contained in the Voter List by the Commission, without regard for the requirements of Texas law, will undermine Texas’s use restrictions and harm Texas voters.

70. The Commission’s intended (or compelled) publication of the information provided by Texas (and other states) would eviscerate the requirements set forth in Tex. Elec. Code § 18.066, including its requirement that a party submit an affidavit promising not to “use the information . . . in connection

with advertising or promoting commercial products or services” before the Voter List is furnished.

71. In fact, the affidavit that requesting parties must execute specifically states “I do solemnly swear that the information obtained from the copy of the State Master Voter File will not be used to advertise or promote commercial products or services.” *See Voter Registration Public Information Request Form*, Texas Secretary of State, <https://www.sos.state.tx.us/elections/forms/pi.pdf> (last visited July 17, 2017). Once Texas’s Voter List is made public by the Commission, neither the Commission nor the Defendants can effectively monitor or police the use of the Voter List. Hence, even if the Commission and/or its members sign the affidavit, it is impossible to guarantee the promise will be upheld when the information is publicly dispersed.

72. Thus, by turning the Voter List or its information over to the Commission, the Defendants would be sanctioning the disclosure of information regarding millions of Texans to private firms, who could use such data without limitation and to the detriment of the privacy and associational rights of Texas voters, including Plaintiffs and their members.

**COUNT I:**  
**Violation of Tex. Elec. Code § 18.066 *et seq.***

73. Plaintiffs reallege and incorporate all prior paragraphs of this Complaint.

74. The Defendants' release of the birth dates included in the Voter List violates Texas law.

75. Furthermore, the Defendants' release of the Voter List or information from the Voter List without adhering to the requirements and protections of the Texas Election Code, Tex. Elec. Code § 18.066 *et seq.*, violates Texas law.

76. Neither the Secretary nor members of the Elections Division are permitted to simply release the information to the Commission. The Defendants must follow the procedures outlined in Tex. Elec. Code § 18.066 in order to release the Voter List or information from the Voter List.

77. Specifically, the Defendants cannot distribute social security numbers or any part thereof pursuant to Tex. Elec. Code § 18.066(b).

78. Moreover, before being entitled to receive even the limited information permitted under Tex. Elec. Code § 18.066, the Commission and/or its members must first sign a notarized affidavit stating that the information the Commission and/or its members receive from the Voter File "will not be used to advertise or promote commercial products or services." *See Voter Registration Public Information Request Form*, Texas Secretary of State, <https://www.sos.state.tx.us/elections/forms/pi.pdf> (last visited July 17, 2017).

79. The Defendants cannot sidestep Texas law simply because the Commission has requested the data. Rather, the Defendants must treat the

Commission like every other entity requesting the Voter List—that is, requiring a notarized affidavit and the remittance of a fee. Otherwise, Texas election law, which limits the use of the Voter List and information contained in it, can be easily circumvented once the Commission releases the Voter List to the general public.

80. These statutory protections are especially important in this case, as the Commission has stated that the information it receives will be shared with the public. Moreover, even if the Commission states its intention not to share the Voter List information, its publication may be required by federal law. This dissemination could lead to Texas voters' information being used by others for commercial purposes in violation of Tex. Elec. Code § 18.067. And the dissemination of voters' identifying information in combination with their physical addresses, mailing addresses, and voting history creates a further risk of harassment and intimidation.

81. If the Commission follows through on its stated plan to disseminate the information it receives to the public, then the Commission necessarily cannot guarantee that it will not be used “in connection with advertising or promoting commercial products or services” as required by the affidavit under Tex. Elec. Code § 18.066(d). Once voters' information becomes publicly available, the uses and purposes other entities have for it will be beyond the control of both the Defendants and the Commission.

82. Unless enjoined by this Court, Plaintiffs will suffer irreparable harm from the exposure of personal voter information, with no alternative adequate remedy at law.

83. Given the clear limitations imposed on the Defendants under Texas law and the rights of Texas voters, the irreparable nature of the harm that would follow of the release of the Voter List or information from the Voter List, and the fact that other remedies would not prevent a failure of justice, injunctive relief should be granted.

**COUNT II:**  
**Violation of Tex. Gov't Code § 552.101**

84. Plaintiffs reallege and incorporate all prior paragraphs of this Complaint.

85. On information and belief, the Secretary has indicated that birthdates are among the information that he intends to provide to the Commission.

86. The Defendants' release of the birth dates included in the Voter List violates Texas law.

87. Texas courts have held, and the Attorney General of Texas has acknowledged, that public citizens' dates of birth are protected by common-law privacy pursuant to Tex. Gov't Code § 552.101.

88. The provision of birth dates, in connection with the other information that the Commission has requested, can and will lead to identify theft and other invasions of privacy.

89. Accordingly, the Defendants cannot distribute voters' birth dates consistent with Texas law.

90. Unless enjoined by this Court, Plaintiffs will suffer irreparable harm from the exposure of their birth dates, with no alternative adequate remedy at law.

91. Given the clear limitations imposed on the Defendants under Texas law and the rights of Texas voters, the irreparable nature of the harm that would follow of the release of birth dates, and the fact that other remedies would not prevent a failure of justice, injunctive relief should be granted.

### **PRAYER FOR RELIEF**

WHEREFORE, the Plaintiffs request the following relief and judgment:

- A. a judgment in favor of Plaintiffs and against the Defendants, and under the authority of Tex. Civ. Prac. & Rem. Code § 65.011, entry of a temporary injunction, and after trial, a permanent injunction enjoining the Defendants, Secretary of State Rolando Pablos, and Keith Ingram, Director, Texas Elections Division, from providing the Voter List or any part thereof to the Commission.
- B. a declaratory judgment in favor of the Plaintiffs pursuant to Tex. Civ. Prac. & Rem. Code § 37.003, finding and determining that as announced:
  1. the release of birth dates as part of the Voter List would violate Tex. Gov't Code § 552.101 and Texas law generally;

2. Defendants' release of the Voter List or any part thereof to the Commission must comply with all aspects of Tex. Elec. Code § 18.066 *et seq.*, including but not limited to the submission of a proper request, payment of a fee, and guarantees and assurances as to the use and publication of the Voter List information;
  3. Plaintiffs' rights will be irreparably harmed without injunctive or declaratory relief from this Court; and
  4. the Defendants are under no obligation to provide the Voter List or any part thereof to the Commission in response to its June 28, 2017 request, or any other similar request.
- C. An order and judgment that Plaintiffs recover the costs of this action.
- D. Such other and further relief as the Court deems just in the premises.

Respectfully submitted,

LAW OFFICE OF CHARLES McGARRY

/s/ Charles W. McGarry

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ATTORNEYS FOR PLAINTIFFS

LEAGUE OF WOMEN VOTERS OF TEXAS,	§	IN THE DISTRICT COURT
TEXAS STATE CONFERENCE OF THE	§	
NATIONAL ASSOCIATION FOR THE	§	
ADVANCEMENT OF COLORED PEOPLE	§	
(NAACP) and RUTHANN GEER,	§	
	§	
<i>Plaintiffs,</i>	§	
	§	
vs.	§	TRAVIS COUNTY, TEXAS
	§	
ROLANDO PABLOS, Secretary of State For the	§	
State of Texas, and KEITH INGRAM, Director,	§	
Texas Elections Division of the Secretary of State,	§	
	§	
<i>Defendants.</i>	§	98 <sup>th</sup> JUDICIAL DISTRICT

**PLAINTIFFS’ SWORN SECOND AMENDED PETITION  
FOR DECLARATORY AND INJUNCTIVE RELIEF**

COME NOW the Plaintiffs, LEAGUE OF WOMEN VOTERS OF TEXAS, TEXAS STATE CONFERENCE OF THE NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE (NAACP), and RUTHANN GEER, and for their cause of action against the Defendants, ROLANDO PABLOS, Secretary of State for the State of Texas; and KEITH INGRAM, Director, Texas Elections Division, allege:

**THE PARTIES**

1. Plaintiff, the League of Women Voters of Texas (the “League”), is a nonpartisan, nonprofit organization founded in 1919 whose primary place of business is in Travis County, Texas.

2. Plaintiff, the Texas State Conference of the National Association for the Advancement of Colored People (the “NAACP”), is a nonpartisan, nonprofit organization chartered in 1940, whose primary place of business is in Travis County, Texas.

3. Plaintiff, Ruthann Geer is an instructor of government at Tarrant County College and a resident of Burleson, Texas. She serves as chair of the Statewide Nominating Committee of the League of Women Voters of Texas in a volunteer capacity, and formerly served as president.

4. Defendant Rolando Pablos is the Secretary of State for the State of Texas has been served and has appeared herein.

5. Defendant Keith Ingram is the Director of the Elections Division of the Secretary of State, and has been served and has appeared herein.

### **JURISDICTION AND VENUE**

6. This Court has jurisdiction over this action and the requested relief sought under Tex. Civ. Prac. & Rem. Code §§ 37.003 and 65.011.

7. Venue in this Court is proper under Tex. Civ. Prac. & Rem. Code § 15.002(a)(1) and (a)(3) in as much as a substantial part of the events or omissions giving rise to the claim occurred in Travis County and the Defendants’ principal office is in Travis County.

8.

## DISCOVERY

9. Discovery is intended to be conducted under a Level 2 Discovery Control Plan, as set forth in Rule 190.3 of the Texas Rules of Civil Procedure.

## INTRODUCTION

10. This lawsuit seeks to prevent the Texas Secretary of State and Texas Elections Division from producing information from the State’s computerized voter registration files to the Presidential Advisory Commission on Election Integrity (the “PACEI” or “Commission”), or any member or officer thereof, in a manner that does not comply with State law and that can harm millions of registered Texas voters.

11. In the aftermath of his unsubstantiated claim that “millions of people . . . voted illegally” in the 2016 presidential election<sup>1</sup>, President Donald Trump signed Executive Order No. 13,799, which established the Commission. The Commission’s stated mission is to “study the registration and voting processes used in Federal elections,” and to issue a report that addresses, *inter alia*, (i) “those laws, rules, policies, activities, strategies, and practices” that either “enhance” or “undermine the American people’s confidence in the integrity of the voting processes used in Federal elections;” and (ii) “vulnerabilities in voting systems and practices used for Federal elections that could lead to improper voter registrations

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<sup>1</sup> Donald Trump (@realDonaldTrump), Twitter (Nov. 27, 2016, 12:30 PM), <https://twitter.com/realdonaldtrump/status/802972944532209664?lang=en>

and improper voting, including fraudulent voter registrations and fraudulent voting.”  
Exec. Order No. 13,799, 82 Fed. Reg. 22,389 (May 16, 2017).

12. On June 28, 2017, the Commission sent letters to all 50 states (and the District of Columbia), including Texas, seeking a wide range of information pertaining to each state’s voters, including name, address, demographic information, partial social security numbers, party affiliations, criminal felony convictions, registration and voting histories, and more. In doing so, the Commission clearly stated that any information sent to it would become public. The Commission initially requested that Texas and the other states respond by July 14, 2017.

13. The information sought by the Commission is not widely available in Texas, but instead may be released only under certain circumstances and conditions imposed by Texas’s voting laws. Tex. Elec. Code § 18.066. Individuals and entities, like the Commission, seeking large-scale voter information are only permitted to access certain data contained in Texas’s computerized voter registration files and only upon certain conditions. Tex. Elec. Code § 18.066(b).

14. Specifically, requesting individuals or entities may obtain the limited, redacted information from the voter files only after (i) they pay a fee and (ii) they execute a notarized affidavit with the Elections Division of the Secretary of State’s Office (“Elections Division”) stating that they will not use the data in certain enumerated, proscribed ways. *See* Tex. Elec. Code § 18.066. In particular, the

affidavit from the requesting party must state “that the person will not use the information obtained in connection with advertising or promoting commercial products or services.” Tex. Elec. Code § 18.066(d).

15. On June 30, 2017, Texas Secretary of State Rolando Pablos (the “Secretary of State” or “Secretary”) issued a statement regarding the Commission’s request, stating:

The Secretary of State’s office will provide the Election Integrity Commission with public information and will protect the private information of Texas citizens while working to maintain the security and integrity of our state’s elections system.<sup>2</sup>

In doing so, the Secretary indicated that he will provide the Commission with the computerized voter file fields, including the full names of all registrants (including middle names or initials), addresses of most registrants, dates of birth, voting history from 2006 onward, active/inactive status and whether a voter’s registration has been canceled, voting method (absentee, provisional, early), the party primaries that the voter participated in, and the registration effective date.

16. On July 26, 2017, the Commission sent a second letter to all fifty states and the District of Columbia seeking voter data.

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<sup>2</sup> See Lauren McGaughy, *Texas Won’t Release Private Voter Info to Trump Administration*, Dallas News, June 30, 2017, <https://www.dallasnews.com/news/elections/2017/06/30/texas-will-releasevoters-private-info-trump-election-commission>.

17. On information and belief, this second letter (“Second Letter”) was sent to Defendant Pablos. In the Second Letter, the Commission purported to protect “any personally identifiable information” from the data it received.

18. On September 7, 2017, the Commission submitted to Defendants a request for voter data using the Secretary of State’s official form. The request seeks data for the entire state, including “active,” “suspense,” and “cancelled” voters.

19. On September 13, 2017, the Commission submitted to Defendants a revised request for voter data using the Secretary of State’s official form.

20. On information and belief, Defendants intend to respond to the Commission’s request and provide Texas voters’ data by September 28, 2017.

21. The Defendants’ provision of the data requested by the Commission, even if cabined to information generally available to candidates or other organizations who are entitled to request voter information under Texas law, would undermine, and run afoul of, the State’s carefully-crafted regulation of the use of voter data.

22. *First*, either the Commission’s stated intention of publishing otherwise private voter data or the disclosure of the data under federal transparency requirements would enable widespread abuse of that information to the detriment of Texas citizens. While the Commission has submitted an affidavit providing that it “will not use the information obtained in connection with advertising or promoting

commercial products or services”, neither the Commission nor the Defendants can possibly provide assurances as to the voter data’s use once it is made public

23. *Second*, with specific regard to the Commission’s request for voter birth dates, the Commission’s request (and the Defendants’ compliance) threatens the privacy interests of Plaintiffs and other Texas voters. As Texas courts have acknowledged, a citizen has an inherent privacy interest in his or her birth date, given that such date, in combination with other information that the Defendants intend to make available, can result in identity theft. It is for that reason that Texas courts have held that the disclosure of birth date information constituted a “clearly unwarranted invasion of personal privacy.”

24. Providing the requested information to the Commission would make an end-run around Texas’s important restrictions on any secondary dissemination of received voter information. Once the information requested by the Commission is made publicly available (which the Commission has represented that it will do, and may otherwise be compelled by federal transparency requirements), the genie cannot be put back in the bottle.

25. As a result, Plaintiffs request that the Court enter declaratory and injunctive relief preventing the Defendants from releasing the voter registration information sought by the Commission absent a guarantee that the information will

not be further disseminated in violation of Texas law, and remittance of the applicable fees and deposits to which all other individuals and/or entities are subject.

26. As Plaintiffs anticipate the release of voter registration information to the Commission on or by September 28, 2017, Plaintiffs also request that the Court issue temporary injunctive relief to maintain the status quo, pending the resolution of this dispute.

### **STANDING OF THE PARTIES**

27. Plaintiff, the League of Women Voters of Texas (the “League”), is a nonpartisan, nonprofit organization founded in 1919 and based in Austin, Texas. The vast majority of the over 2,000 members of the League are residents of Texas who are registered to vote in Texas and whose information is contained in Texas’s Computerized Voter Registration List (the “Voter List”) which will be released by the Defendants to the Commission.

28. The League has standing to challenge the Defendants’ release of the Voter List on behalf of its members. The League has members who will be directly impacted and harmed by the release of the Voter List information to the Commission. The Voter List contains personal information regarding Texas voters’ identities, which may be used to solicit, harass, or otherwise infringe upon the privacy of Texas voters, including the League’s members.

29. The League also has standing to challenge the Defendants' release of the Voter List on its own behalf. By producing information to the Commission—which has indicated that it will make any documents that are submitted to the Commission available to the public, which may be compelled under Federal Law in any event—the Defendants will impair the privacy of the League's members, including members that the League assisted in registering to vote. It will also make it substantially more difficult for the League to engage in voter-registration and get-out-the-vote activities, which they regularly perform in support of their civic-engagement mission. Voters and prospective voters will be more reluctant to participate in elections or register to vote in the future if they understand that the Defendants are willing to provide information on the Voter List to entities who openly admit that they intend to make such information public. The public disclosure of such personal information will chill League members' as well as other voters' and prospective voters' exercise of First Amendment rights including the right to vote and freedom of association.

30. Last year, the League, through its twenty-five local chapters, conducted at least two hundred voter registration drives. The League also encouraged and assisted individuals in voting and conducted other activities to boost civic engagement, which has been essential to its mission since its founding. If the Defendants provide the Commission with the Voter List, some portion of the

League's funds that would have gone to voter registration, get-out-the-vote, and civic engagement will be redirected to ameliorating the consequences of the Defendants' action, including educating voters regarding the Commission and the State's privacy laws. Furthermore, additional expenses may be incurred by the League as it responds to fallout from the release of Texans' personal information, including (but not limited to) voter education efforts, political activism, and litigation. Thus, the League will be forced to divert time, money, and resources from their other activities in order to expend more time and attention educating and assisting Texas citizens with regard to the protection (or, in this case, non-protection) of their personal information.

31. Plaintiff, the Texas State Conference of the National Association for the Advancement of Colored People (the "NAACP"), is a nonpartisan, nonprofit organization chartered in 1936 and currently based in Austin, Texas. The majority of the over 10,000 members of the NAACP are residents of Texas who are registered to vote in Texas and whose information is contained in the Voter List which will be released by the Defendants to the Commission.

32. The NAACP has standing to challenge the Defendants' release of the Voter List on behalf of its members. The NAACP has members who will be directly impacted and harmed by the release of the Voter List information to the Commission. The Voter List contains personal information regarding Texas voters'

identities, which may be used to solicit, harass, or otherwise infringe upon the privacy of Texas voters, including the NAACP's members.

33. The NAACP also has standing to challenge the Secretary's release of the Voter List on its own behalf. By producing information to the Commission—which has publicly stated it will make any documents that are submitted to the Commission available to the public—the Secretary will impair the privacy of the NAACP's members, including members that the NAACP assisted in registering to vote. It will also make it substantially more difficult for the NAACP to engage in voter-registration and get-out-the-vote activities, which they regularly perform in support of their civic-engagement mission. Voters and prospective voters will be more reluctant to participate in elections or register to vote in the future if they understand that the Secretary is willing to provide information on the Voter List to entities who openly admit that they intend to make such information public. The public disclosure of such personal information will chill NAACP members' as well as other voters' and prospective voters' exercise of First Amendment rights including the right to vote and freedom of association.

34. Last year, the NAACP, through its more than eighty local branches and college chapters, conducted numerous voter registration drives. Following the voter registration deadline, the NAACP helped get voters to the polls, including by providing rides to voting locations. If the Defendants provides Voter List

information to the Commission, some portion of the NAACP's funds that would have gone to voter registration, get-out-the-vote, and civic engagement will be redirected to ameliorating the consequences of the Secretary's action. Furthermore, additional expenses may be incurred by the NAACP as it responds to fallout from the release of Texans' personal information, including (but not limited to) voter education efforts, political activism, and litigation. Thus, the NAACP will be forced to divert time, money, and resources from their other activities in order to expend more time and attention educating and assisting Texas citizens with regard to the protection (or, in this case, non-protection) of their personal information.

35. Plaintiff Ruthann Geer is an instructor of government at Tarrant County College and a resident of Burleson, Texas. She serves as chair of the Statewide Nominating Committee of the League of Women Voters of Texas in a volunteer capacity, and formerly served as president. Ms. Geer is active in voter registration efforts. She is a registered voter and has consistently participated in Texas elections. On information and belief, Ms. Geer's name and information appears in Texas's Voter List. As such, her personal information will be released by the Defendants to the Commission. The release of such personal information will infringe on Ms. Geer's privacy rights. Furthermore, the public disclosure of such personal information could expose Ms. Geer to intimidation or harassment for merely exercising her right to vote, and may chill her exercise of First Amendment

rights including the right to vote and freedom of association. Ms. Geer believes that her unique name and address make her particularly easy to identify and thus susceptible to such harassment, even with the release of limited information. Additionally, Ms. Geer believes that the release of this information will make her students, who already fear disclosure of who they vote for, even more reluctant to register and vote. As a result, Ms. Geer has standing to bring this action individually.

36. Defendant Rolando Pablos is the duly appointed Secretary of State of Texas. He is sued only in his official capacity, and not personally. As Secretary of State, Secretary Pablos has responsibilities over a number of areas, including oversight of elections and the maintenance of state records—including more than 14 million voter registration records. *See Constitutional Duties*, Texas Secretary of State, <https://www.sos.state.tx.us/about/duties.shtml> (last visited July 17, 2017). With regard to elections, Secretary Pablos is Texas’s Chief Elections official and is responsible for maintaining and overseeing appropriate requests for access to the Voter List. Tex. Elec. Code §§ 18.061, 18.066, and 31.001; *see* <https://www.sos.state.tx.us/about/duties.shtml>.

37. Defendant Keith Ingram is the Director of the Texas Elections Division, appointed by the Governor of Texas. He is sued only in his official capacity, and not personally. With regard to elections, Defendant Ingram oversees the Elections

Division which is responsible for maintaining and overseeing appropriate requests for access to the Voter List. Tex. Elec. Code §§ 18.061, 18.066, and 31.001.

### **PLAINTIFFS' CLAIM**

38. Plaintiffs reallege and incorporate all prior paragraphs of this Complaint.

#### ***The Commission and Its Request***

39. The Presidential Advisory Commission on Election Integrity was established on May 11, 2017 by Executive Order (“Commission Order”). *See* Exec. Order. No. 13,799, 82 Fed. Reg. 22,389 (May 16, 2017).

40. Although the Commission has the stated task of “study[ing] the registration and voting processes used in Federal elections,” *see id.*, the Commission does not have any authority to subpoena records, to undertake investigations, or to demand the production of state voter records from state election officials, including in Texas or anywhere else.

41. Nonetheless, on June 28, 2017, the Vice Chair of the Commission, Kansas Secretary of State Kris Kobach, sent a letter to all fifty states and the District of Columbia seeking detailed voter data from each jurisdiction. *See* Office of the Vice President, Readout of the Vice President’s Call with the Presidential Advisory Commission on Election Integrity (June 28, 2017), <https://www.whitehouse.gov/the-press-office/2017/06/28/readout-vice-presidents->

call-presidential-advisory-commission-election (“Vice Chair of the Commission and Kansas Secretary of State Kris Kobach told members a letter will be sent today to the 50 states and District of Columbia on behalf of the Commission requesting publicly-available data from state voter rolls and feedback on how to improve election integrity.”).

42. On information and belief, one of the Commission’s letters was sent to Defendant Pablos (the “Letter”). The Letter sought, *inter alia*, the following data from the Voter List:

[T]he full first and last names of all [Texas voter] registrants, middle names or initials if available, addresses, dates of birth, political party (if recorded in your state), last four digits of social security number if available, voter history (elections voted in) from 2006 onward, active/inactive status, cancelled status, information regarding any felony convictions, information regarding voter registration in another state, information regarding military status, and overseas citizen information.

The Letter also asked Secretary Pablos to provide “evidence or information . . . regarding instances of voter fraud or registration fraud” and information on in-state “convictions for election-related crimes . . . since the November 2000 federal election.”

43. The Letter stated that “any documents that are submitted to the full Commission will also be made available to the public.”

44. By the plain terms of the Letter, the Commission requested that the Secretary provide the aforementioned Texas data by July 14, 2017.

45. On information and belief, in connection with a separate lawsuit pending in the U.S. District Court for the District of Columbia, on July 10, a federal officer working on behalf of the Commission notified election officials on behalf of the Commission, and requested a temporary hold on submitting data to the Commission. Plaintiffs are unaware of whether Defendants or any entity in Texas received this message.

46. On July 26, 2017, the Commission sent the Second Letter to all states and the District Columbia, including, on information and belief, Secretary Pablos.

47. The Commission submitted its request form on September 7, 2017, and its revised request form on September 13, 2017.

48. On information and belief, Defendants intend to respond to the Commission's request and provide Texas voters' data by September 28, 2017.

*Transparency requirements in federal law*

49. As an advisory committee covered under the Federal Advisory Committee Act (FACA), 5 U.S.C. § App. 2, the Commission must make available for inspection all "the records, reports, . . . or other documents which were made available" to it unless those records fall within one of the enumerated exceptions. 5 U.S.C. App. 2 § 10(b).

50. Indeed, the Commission has already been sued to compel its compliance with FACA's transparency requirements. See Lawyers' Committee for Civil

Rights Under Law v. Presidential Advisory Commission on Election Integrity, et al., No. 1:17-cv-01354 (D.D.C. July 10, 2017).

51. The Commission has submitted the Texas Voter Registration Public Information Request Form, but that form does not contemplate a scenario in which the requester is governed by a statute with disclosure requirements like those set forth in FACA.

52. On information and belief, the Commission has made no public representations as to how it will ensure the privacy of the Voter List while maintaining compliance with FACA.

*The risk of harm to Plaintiffs*

53. Plaintiff League of Women Voters of Texas consists of over 2,000 members, the vast majority of whom are Texas residents who are registered to vote in the state. Their personal information, including names, addresses, and dates of birth, is included in the Voter List that the Secretary of State intends to release to the Commission.

54. Plaintiff Ruthann Geer is a registered Texas voter whose personal information, including name, address, and date of birth, is included in the Voter List that the Secretary of State intends to release to the Commission.

55. The identifying information on the Voter List, if made public, may be used to solicit, harass, or otherwise infringe upon the privacy of Texas voters, including the League's members and Ruthann Geer.
56. That same information, if made public, could lead to Plaintiffs' and Texas voters' information being used by others for commercial purposes in violation of Tex. Elec. Code § 18.067. State law specifically contemplates this harm and sets out the prohibition against commercial use in response.
57. If Defendants release the Voter List to the Commission, the League will be forced to redirect its resources away from its civic engagement activities and toward addressing the consequences of that action. The release of the Voter List will also make it substantially more difficult for the League to engage in voter-registration and get-out-the-vote activities, which they regularly perform in support of their civic-engagement mission. Voters and prospective voters will be more reluctant to participate in elections or register to vote in the future if they understand that the Defendants are willing to provide information on the Voter List to entities who openly admit that they intend to make such information public, or may be compelled to do so. The public disclosure of such personal information will chill League members' as well as other voters' and prospective voters' exercise of First Amendment rights including the right to vote and freedom of association.

58. Once Defendants transmit the Voter List to the Commission, as will happen imminently absent court action, all of the implicated privacy and commercial use considerations become active concerns. Once in possession of the Voter List, the Commission could at any point release it intentionally, be compelled to release it, or have it stolen. The harm to Plaintiffs would be irreversible. But Defendants suffer no harm from withholding the release of the Voter List and maintaining the status quo while this matter is resolved.
59. The facts essential to injunctive relief are sworn to in the attached affidavits of Elaine Wiant, Ruthann Geer and Tomas Lopez.

***Texas's Voter List and Distribution of Voter Data***

60. Texas requires citizens to register to vote in order to participate in state and federal elections within the state. Tex. Elec. Code § 11.002(a)(6).

61. The Texas voter registration form instructs prospective voters to provide at least the following information: name; residence and postal address; any previous voter registration address in Texas; Texas county of residence; date of birth; previous name (if applicable); driver's license number (if applicant possesses one) or last four digits of social security number (if no driver's license); and date of application for registration. Other information, including a voter's gender and telephone number, is requested on the form, but is optional. Furthermore, the

application requires applicants to affirm that they: reside in the stated county and are a citizen of the United States; have not been finally convicted of a felony, or if a felon, have completed all punishment; and have not been determined by a court to be mentally incapacitated. The state’s voter registration application can be located through a link on the Secretary’s website. *See Voter Registration Application*, Texas Secretary of State, <http://www.sos.state.tx.us/elections/forms/vr-with-receipt.pdf> (last visited July 17, 2017).

62. The Director of the Elections Division, at the direction of the Secretary, is charged with implementing and maintaining “a statewide computerized voter registration list that serves as the single system for storing and managing the official list of registered voters in the state.” Tex. Elec. Code § 18.061.

63. Under Texas and federal law “[t]he statewide computerized voter registration list must: (1) contain the name and registration information of each voter registered in the state; (2) assign a unique identifier to each registered voter; and (3) be available to any election official in the state through immediate electronic access.” Tex. Elec. Code § 18.061(b).

64. Texas further provides that the local voter registrar must electronically submit to the Secretary each voter participating in an election within thirty days of the election. This data “must include a notation of whether the voter voted on

election day, voted early by personal appearance, [or] voted early by mail.” Tex. Elec. Code § 18.069.

65. Information on registered voters is not openly posted on the Internet and is generally not made available absent a specific request by an individual or entity. In the case of such a request, however, the Secretary is required to “furnish information in the statewide computerized voter registration list to any person on request not later than the 15th day after the date the request is received.” Tex. Elec. Code § 18.066(a).

66. Such request, however, is limited to certain information and must meet specific requirements.

67. *First*, the Secretary may not furnish (i) any voter’s social security number; or (ii) certain residential addresses. Tex. Elec. Code § 18.066(b).

68. *Second*, any request for voter information must be accompanied by “an affidavit to the secretary stating that the person will not use the information obtained in connection with advertising or promoting commercial products or services.” Tex. Elec. Code § 18.066(d). No data is to be furnished unless the affidavit is submitted to the Secretary.

69. The Director of the Elections Division requires the affidavit to be signed before a notary public. *See Voter Registration Public Information Request*

*Form*, Texas Secretary of State, <https://www.sos.state.tx.us/elections/forms/pi.pdf> (last visited July 17, 2017).

70. In addition, use of the Voter List “in connection with advertising or promoting commercial products or services” is a Class A misdemeanor. Tex. Elec. Code § 18.067.

71. *Third*, Texas law authorizes the Secretary to collect fees when furnishing the Voter List. Tex. Elec. Code § 18.066(e). On information and belief, the Elections Division charges a minimum of \$93.75 for a CD-ROM containing the Voter List, and over \$1,000 for a list of the size of Texas’s registered voter population. *See Voter Registration Public Information Request Form*, Texas Secretary of State, <https://www.sos.state.tx.us/elections/forms/pi.pdf> (last visited July 17, 2017).

72. In addition, on information and belief, the Secretary requires that a \$75.00 deposit accompany each request for the Voter List information. *See Voter Registration Public Information Request Form*, Texas Secretary of State, <https://www.sos.state.tx.us/elections/forms/pi.pdf> (last visited July 17, 2017).

73. *Fourth*, Texas courts have recognized a “nontrivial privacy interest” in birth dates. *See Paxton v. City of Dallas*, No. 03-13-00546-CV, 2015 WL 3394061, at \*3 (Tex. App. May 22, 2015) (concluding that “public citizens have a privacy interest in their birth dates”), *review denied* (Sept. 4, 2015); *Tex. Comptroller of Pub.*

*Accounts v. Att’y Gen. of Tex.*, 354 S.W.3d 336, 346-48 (Tex. 2010) (holding that disclosure of state employee birth dates constituted a “clearly unwarranted invasion of personal privacy”); *see also* Tex. Att’y Gen. Op. OR2017-06026 (2017) (“Based on *Texas Comptroller*, the court of appeals [in *City of Dallas*] concluded the privacy rights of public employees apply equally to public citizens, and thus, public citizens’ dates of birth are also protected by common-law privacy . . .”). In doing so, courts have recognized the derivative harm arising from the release of information, including the threat that the disclosure of birth dates, along with other information, could be used for identity theft. Specifically, the Texas Supreme Court acknowledged in *Texas Comptroller* that the disclosure of “[birth] dates, when combined with name and place of birth, can reveal social security numbers.” 354 S.W.3d at 345.

### ***Texas’s Provision of Data to the Commission***

74. On information and belief, the Commission submitted a voter information request form to Defendants on September 7, 2017, and a revised request form on September 13, 2017.

75. On information and belief, neither the Commission nor any of its members has explained to the Defendants, let alone offered any assurances or agreement, regarding how it will prevent third parties from using the Voter List

information for advertising or promoting commercial products or services once the Voter List information is in the hands of the Commission.

76. On information and belief, the Secretary has acknowledged it will provide certain information to the Commission including voter names, addresses, dates of birth and registration, voting methods, voter status, and the elections (including primaries) in which specific voters have participated.

77. On information and belief, the Secretary has not yet released the Voter List (or any other data) to the Commission, but intends to do so in response to the Commission's request by September 28, 2017. Unless restrained by this Court's injunction, the Defendants will imminently release the Voter List (or a subset of information contained in the Voter List) to the Commission.

78. The disclosure of birth dates included in the Voter List would violate Texas law and the rights of Texas citizens.

79. Additionally, the Commission's intended use of the Voter List, as confirmed in the Commission's Letter itself, would violate Texas law and the rights of Texas citizens.

80. Provision of the Voter List information to the Commission would multiply the number of individuals and entities with access to the information.

81. The Commission's Letter stated that "any documents that are submitted to the full Commission will also be made available to the public." The Commission

therefore apparently intends to make information received from the Texas Voter List fully available to the public.

82. In a July 5 filing in a case in the District of Columbia, Mr. Kobach, the Vice Chair of the Commission, reaffirmed that there would be a “public release of documents,” but asserted, without any explanation, that the voter roll data would be “de-identif[ied].” This assertion did not indicate which information from Texas’s (or any other states’) voter rolls would be made available to the public and which would not. Nonetheless, Mr. Kobach proffered, with no further explanation, that the “voter rolls themselves will not be released to the public by the Commission.” Decl. of Kris W. Kobach at 3, *Elec. Privacy Info. Ctr. v. Presidential Advisory Comm’n on Election Integrity*, No. 1:17-cv-01320-CKK (D.D.C. July 5, 2017), ECF No. 8-1.

83. On information and belief, the Commission has not issued a formal communication to Texas state officials (or to the officials in any other state) resolving the discrepancy between the express language in the June 28 letter that the Voter List information received in response to that request would later be made public, and the representation in the Second Letter that information would be protected in some manner.

84. Moreover, even if the Commission itself intended to keep the voter information private, it is not clear that the Commission, which is an advisory committee covered under the Federal Advisory Committee Act (FACA), has the

authority to prevent the dissemination of information provided to it. Rather, FACA requires advisory committees like the Commission to make available for public inspection all “the records, reports, . . . or other documents which were made available” to it unless those records fall within one of the enumerated exceptions. 5 U.S.C. App. 2 § 10(b). There is thus still a serious risk that, even if the Commission indicated that it did not intend to make any information provided to it public, the Voter List will still be made available, irrespective of any post-hoc assertions from Mr. Kobach.

85. The public dissemination of information contained in the Voter List by the Commission, without regard for the requirements of Texas law, will undermine Texas’s use restrictions and harm Texas voters.

86. The Commission’s intended (or compelled) publication of the information provided by Texas (and other states) would eviscerate the requirements set forth in Tex. Elec. Code § 18.066, including its requirement that a party submit an affidavit promising not to “use the information . . . in connection with advertising or promoting commercial products or services” before the Voter List is furnished.

87. In fact, the affidavit that requesting parties must execute specifically states “I do solemnly swear that the information obtained from the copy of the State Master Voter File will not be used to advertise or promote commercial products or services.” *See Voter Registration Public Information Request Form*, Texas

Secretary of State, <https://www.sos.state.tx.us/elections/forms/pi.pdf> (last visited July 17, 2017). Once Texas's Voter List is made public by the Commission, neither the Commission nor the Defendants can effectively monitor or police the use of the Voter List. Hence, it is impossible to guarantee the promise will be upheld when the information is publicly dispersed. In particular, neither the Defendants nor the Commission can guarantee that individuals or entities who seek or receive the Voter List information from the Commission will be subject to the use limitations imposed by Texas law.

88. Thus, by turning the Voter List or its information over to the Commission, the Defendants would be sanctioning the disclosure of information regarding millions of Texans to private firms, who could use such data without limitation and to the detriment of the privacy and associational rights of Texas voters, including Plaintiffs and their members.

**COUNT I:**  
**Violation of Tex. Elec. Code § 18.066 *et seq.***

89. Plaintiffs reallege and incorporate all prior paragraphs of this Complaint.

90. The Defendants' release of the birth dates included in the Voter List violates Texas law.

91. Furthermore, the Defendants' release of the Voter List or information from the Voter List without adhering to the requirements and protections of the Texas Election Code, Tex. Elec. Code § 18.066 *et seq.*, violates Texas law.

92. Neither the Secretary nor members of the Elections Division are permitted to simply release the information to the Commission. The Defendants must follow the procedures outlined in Tex. Elec. Code § 18.066 in order to release the Voter List or information from the Voter List.

93. Specifically, the Defendants cannot distribute social security numbers or any part thereof pursuant to Tex. Elec. Code § 18.066(b).

94. Moreover, before being entitled to receive even the limited information permitted under Tex. Elec. Code § 18.066, the Commission and/or its members must first sign a notarized affidavit stating that the information the Commission and/or its members receive from the Voter File “will not be used to advertise or promote commercial products or services.” *See Voter Registration Public Information Request Form*, Texas Secretary of State, <https://www.sos.state.tx.us/elections/forms/pi.pdf> (last visited July 17, 2017).

95. The Defendants cannot sidestep Texas law simply because the Commission has requested the data. Rather, the Defendants must treat the Commission like every other entity requesting the Voter List—that is, requiring a notarized affidavit and the remittance of a fee. Otherwise, Texas election law, which

limits the use of the Voter List and information contained in it, can be easily circumvented once the Commission releases the Voter List to the general public.

96. These statutory protections are especially important in this case, as the Commission has stated that the information it receives will be shared with the public. Moreover, even if the Commission states its intention not to share the Voter List information, its publication may be required by federal law. This dissemination could lead to Texas voters' information being used by others for commercial purposes in violation of Tex. Elec. Code § 18.067. And the dissemination of voters' identifying information in combination with their physical addresses, mailing addresses, and voting history creates a further risk of harassment and intimidation.

97. If the Commission follows through on its stated plan to disseminate the information it receives to the public, then the Commission necessarily cannot guarantee that it will not be used "in connection with advertising or promoting commercial products or services" as required by the affidavit under Tex. Elec. Code § 18.066(d). Once voters' information becomes publicly available, the uses and purposes other entities have for it will be beyond the control of both the Defendants and the Commission.

98. Unless enjoined by this Court, Plaintiffs will suffer irreparable harm from the exposure of personal voter information, with no alternative adequate remedy at law.

99. Given the clear limitations imposed on the Defendants under Texas law and the rights of Texas voters, the irreparable nature of the harm that would follow of the release of the Voter List or information from the Voter List, and the fact that other remedies would not prevent a failure of justice, injunctive relief should be granted.

**COUNT II:**  
**Violation of Tex. Gov't Code § 552.101**

100. Plaintiffs reallege and incorporate all prior paragraphs of this Complaint.

101. On information and belief, the Secretary has indicated that birthdates are among the information that he intends to provide to the Commission.

102. The Defendants' release of the birth dates included in the Voter List violates Texas law.

103. Texas courts have held, and the Attorney General of Texas has acknowledged, that public citizens' dates of birth are protected by common-law privacy pursuant to Tex. Gov't Code § 552.101.

104. The provision of birth dates, in connection with the other information that the Commission has requested, can and will lead to identify theft and other invasions of privacy.

105. Accordingly, the Defendants cannot distribute voters' birth dates consistent with Texas law.

106. Unless enjoined by this Court, Plaintiffs will suffer irreparable harm from the exposure of their birth dates, with no alternative adequate remedy at law.

107. Given the clear limitations imposed on the Defendants under Texas law and the rights of Texas voters, the irreparable nature of the harm that would follow of the release of birth dates, and the fact that other remedies would not prevent a failure of justice, injunctive relief should be granted.

### **PRAYER FOR RELIEF**

WHEREFORE, the Plaintiffs request the following relief and judgment:

- A. a judgment in favor of Plaintiffs and against the Defendants, and under the authority of Tex. Civ. Prac. & Rem. Code § 65.011, entry of a temporary injunction, and after trial, a permanent injunction enjoining the Defendants, Secretary of State Rolando Pablos, and Keith Ingram, Director, Texas Elections Division, from providing the Voter List or any part thereof to the Commission.
- B. a declaratory judgment in favor of the Plaintiffs pursuant to Tex. Civ. Prac. & Rem. Code § 37.003, finding and determining that as announced:
  1. the release of birth dates as part of the Voter List would violate Tex. Gov't Code § 552.101 and Texas law generally;
  2. Defendants' release of the Voter List or any part thereof to the Commission must comply with all aspects of Tex. Elec. Code § 18.066 *et seq.*, including but not limited to the submission of a proper request, payment of a fee, and guarantees and assurances as to the use and publication of the Voter List information;
  3. Plaintiffs' rights will be irreparably harmed without injunctive or declaratory relief from this Court; and

4. the Defendants are under no obligation to provide the Voter List or any part thereof to the Commission in response to its June 28, 2017 request, or any other similar request.
- C. An order enjoining the Defendants, Secretary of State Rolando Pablos, and Keith Ingram, Director, Texas Elections Division, from providing the Voter List and any part thereof to the Commission.
- D. An order and judgment that Plaintiffs recover the costs of this action.
- E. Such other and further relief as the Court deems just in the premises.

Respectfully submitted,

LAW OFFICE OF CHARLES McGARRY

*/s/ Charles W. McGarry* \_\_\_\_\_

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(214) 748-9449 fax  
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New York, NY 10271  
(646) 292-8310 phone  
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[myrna.perez@nyu.edu](mailto:myrna.perez@nyu.edu)  
[wendy.weiser@nyu.edu](mailto:wendy.weiser@nyu.edu)  
[tomas.lopez@nyu.edu](mailto:tomas.lopez@nyu.edu)  
*(Applications for admission  
pro hac vice pending)*

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Michael A. Glick, Esq.  
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[michael.glick@kirkland.com](mailto:michael.glick@kirkland.com)  
*(Applications for admission pro hac vice  
forthcoming)*

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of this instrument was delivered to the following attorney of record on this 21<sup>st</sup> day of September, 2017, in accordance with the Texas Rules of Civil Procedure:

Esteban S.M. Soto  
Assistant Attorney General  
General Litigation Division  
Office of the Attorney General  
300 West 15th Street  
Austin, TX 78701  
Phone: 512-475-4054  
Fax: 512-320-0667  
[Esteban.Soto@oag.texas.gov](mailto:Esteban.Soto@oag.texas.gov)

*/s/ Charles W. McGarry*  
Charles W. McGarry

LEAGUE OF WOMEN VOTERS OF TEXAS,	§	IN THE DISTRICT COURT
TEXAS STATE CONFERENCE OF THE	§	
NATIONAL ASSOCIATION FOR THE	§	
ADVANCEMENT OF COLORED PEOPLE	§	
(NAACP) and RUTHANN GEER,	§	
	§	
<i>Plaintiffs,</i>	§	
	§	
vs.	§	TRAVIS COUNTY, TEXAS
	§	
ROLANDO PABLOS, Secretary of State For the	§	
State of Texas, and KEITH INGRAM, Director,	§	
Texas Elections Division of the Secretary of State,	§	
	§	
<i>Defendants.</i>	§	98 <sup>th</sup> JUDICIAL DISTRICT

**AFFIDAVIT OF ELAINE WIAINT IN SUPPORT OF PLAINTIFFS' APPLICATION FOR A TEMPORARY RESTRAINING ORDER AND TEMPORARY INJUNCTION**

I affirm the following to be true under the penalties of perjury:

1. I am the President of the League of Women Voters of Texas. I have served in this capacity since June 1, 2014.
2. In my capacity as President of the League of Women Voters of Texas, I coordinate the activities of our local Leagues on a number of statewide matters. I communicate regularly with local Leagues on their voter registration and voter education activities.
3. The League is a nonpartisan political organization that encourages informed and active participation in government, and fights to improve our systems of government and to impact public policies. Our organization's main purpose is to encourage people to vote, keep them informed as voters, and also seek out information from candidates and public officials to serve the electorate and citizenry.

4. The League executes its civic engagement mission in a number of ways, including through voter registration and get-out-the-vote activities. Last year, the League, through its twenty-five local chapters, conducted at least two hundred voter registration drives.
5. The League has over 2,000 members, the vast majority of which are Texas residents who are registered to vote in the state. Their information is included in the voter list that the Secretary of State intends to release to the Presidential Advisory Commission on Election Integrity.
6. If the Secretary of State is permitted to provide voter data to the Commission, the personal information of League members will be included in any data set released. I understand this to include, among other things, names; residence and postal addresses; and dates of birth.
7. I am concerned about the harm that will result if League members' personal information is handed over to the Commission, especially as it relates to the impairment of their privacy.
8. I specifically fear that the Commission will make personal information public, as it initially promised, that it will be forced to make that information public by law, or that hackers will access that data.
9. Regardless of the way in which this information is made public, I am concerned that League members could be subject to harassment and intimidation by those who may oppose their viewpoints or participation in our organization. I worry that the public release of names, addresses, and birth dates, among other details, would allow malicious individuals to reach individuals directly or otherwise use that information to harass them.

10. I am also concerned about the vulnerability of League members' personal information to identity thieves. I understand that the Commission has not promised the Secretary of State that it would use specific security measures to protect individuals' information.
11. Furthermore, if Texans' personal information is released, our organization will be forced to redirect its resources away from its civic engagement activities and toward addressing the consequences of the Secretary of State's action. I believe that voters and prospective voters will be more reluctant to participate in elections or register to vote in the future if they understand that the Secretary of State is willing to provide their personal information to entities who openly admit that they intend to make such information public. The League will therefore expend more time and attention educating and assisting Texas citizens with regard to the protection (or, in this case, non-protection) of their personal information.
12. I understand that whenever the Commission makes personal information public, whether deliberately or otherwise, it will be effectively impossible to get back. This harm cannot be undone.
13. If the Secretary of State is permitted to provide League members' personal information, including dates of birth, to the Commission, that information will be immediately vulnerable to both security breaches and its deliberate or compelled release.

Executed this   19   day of September 2017.



Elaine Wiant  
President, League of Women Voters of Texas



5. I specifically fear that the Commission will make my personal information public, as it initially promised, that it will be forced to make my information public by law, or that hackers will access that data.
6. Regardless of the way in which my information is made public, I fear that I could be subject to harassment and intimidation by those who may oppose my viewpoints or participation in the League of Women Voters. I worry that the public release of my name, address, and date of birth, among other details, would allow malicious individuals to reach me directly or otherwise use that information to harass me. I am especially concerned about this because I live alone in a rural part of the state.
7. I am also concerned about the vulnerability of my personal information to identity thieves. I understand that the Commission has not promised the Secretary of State that it would use specific security measures to protect my and other people's information.
8. I understand that whenever the Commission makes my personal information public, whether deliberately or otherwise, it will be effectively impossible to get back. This harm cannot be undone.
9. If the Secretary of State is permitted to provide my personal information, including my date of birth, to the Commission, that information will be immediately vulnerable to both security breaches and its deliberate or compelled release.

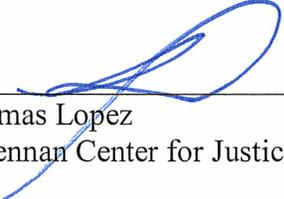
Executed this 20<sup>th</sup> day of September 2017.

  
Ruthann Geer



5. On September 19, 2017, Defendants' counsel informed Plaintiffs' counsel that Defendants received a revised "Voter Registration Public Information Request Form" dated September 13 from Ron Williams. Defendants' counsel also provided Plaintiffs' counsel with a digital copy of this form, which also included an affidavit submitted by Mr. Williams.
6. This second form and affidavit are attached hereto Exhibit 2.
7. Pursuant to representations made by Defendants' counsel, it is our understanding that, absent an injunction, Defendants will provide the requested voter information to the Commission within fifteen days of the receipt of the revised request form, or on or before September 28, 2017.

Executed this 20<sup>th</sup> day of September 2017.

  
\_\_\_\_\_  
Tomas Lopez  
Brennan Center for Justice at NYU School of Law

# EXHIBIT 1

# The State of Texas



Elections Division  
P.O. Box 12060  
Austin, Texas 78711-2060  
www.sos.state.tx.us

Phone: 512-463-5650  
Fax: 512-475-2811  
Dial 7-1-1 For Relay Services  
(800) 252-VOTE (8683)

Secretary of State

**For Internal Use Only**  
Receipt date: \_\_\_/\_\_\_/\_\_\_  
PIR-Log number: \_\_\_\_\_

## VOTER REGISTRATION PUBLIC INFORMATION REQUEST FORM

**Media must be completed:**

**Media**

- CD-ROM  
 FTP - Provide FTP information:

FTP site: \_\_\_\_\_  
Login: \_\_\_\_\_  
Password: \_\_\_\_\_

**Format being provided**

Voter registration list (individual records)  
in zipped fixed width text file(s). See the  
attached record layout.

**Requestor name:**

Ron Williams

**(required)**

**Flagging Options ONLY**

- Hispanic surname flag notation

**Voters may be extracted by**

*Please checkmark all that apply to the request:*

- Include Active Voters  
 Include Suspense Voters  
 Include Cancelled Voters

**I would like my data reduced to the following**

*Please checkmark all that apply to the request:*

- Only voters with Texas mailing address  
 Only voters who are effective to vote between  
\_\_\_\_\_ and \_\_\_\_\_ dates  
 Only voters between the age \_\_\_\_\_ and \_\_\_\_\_  
 Hispanic Surnames only  
 Males only  
 Females only  
 Voters who Voted in the following Elections:  
 Entire State  Counties listed below only

**Elections and Years:**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

A "suspense voter" is a voter known to have an incorrect or outdated address.

The county has sent the voter a form to obtain a new current address, but no response has been received. The voter is however, considered to be an active voter for voting purposes.

If the entire state is requested, mark the space provided. If a district or county is requested, list the district number or county (write "All" by the county name to indicate all precincts). Otherwise, for partial district, county or other requests, please list the county names and applicable precinct numbers.

**COUNTY NAME(S) or DISTRICT NUMBER(S)**      Check if entire State

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

NOTE: For requests in addition to the options provided on this form, please email [elections@sos.texas.gov](mailto:elections@sos.texas.gov), as a data manipulation estimate may need to be provided for you.

<b><u>For Internal Use Only</u></b>		
First Reviewer: _____	Date reviewed: ___/___/___	EFM: _____
Second Reviewer: _____	Date reviewed: ___/___/___	Date processed: _____
Completion date: ___/___/___		

## PUBLIC INFORMATION REQUEST FORM DETAILS AND INSTRUCTIONS

### Send Order to:

Ron Williams, Policy Advisor

Presidential Advisory Commission on Election Integrity

1650 Pennsylvania Ave., NW, EEOB-Rm. 268, Washington, DC 20504

Telephone (202) 881-7807

### Send Statement to:

Kris L. Palmer, Program Analyst

General Services Administration

1800 F Street, NW, Washington, D.C. 20405

Telephone (202) 501-0525

Below are the procedures for filling out the attached Public Information Request form. Failure to adequately complete the form may cause incorrect information or could delay the processing of your order.

1. Media Selection: CD-ROM or FTP. If selecting an FTP please provide FTP site, login and password information.
2. Format: Voter registration list (individual records) in zipped fixed width text file(s). See the attached record layout.
3. Extracts & Data Reduction- Options may be selected to select a limited group of voters. Additional extract requests may result in data manipulation, which would result in additional charges. Section 552.231 of the Texas Government Code requires that agencies send a written statement about the cost of potentially manipulating data to any requestor. Should it be determined that your request will require data manipulation, then a statement of the estimated cost of providing the information in the requested form will be supplied to you within the timeframe outlined in section 552.231.
4. In the area for county name(s) or District Number(s), please note the following: **If the entire state is requested**, mark the space provided. **If a district or county is requested**, list the district number or county (write "All" by the county name to indicate all precincts). Otherwise, for partial district, county or other requests, please list the county names and applicable precinct numbers.
5. The attached affidavit must be signed before a notary public. A \$75.00 deposit must accompany each request. If the request is from a Member of the House or Senate, the Member must submit the request through the appropriate business office for approval of funds **before** submitting it to this office, unless the request is being paid for out of personal funds. CD-ROM will not be released and/or files will not be uploaded to the FTP until full payment is received. A complete address (No P. O. Box) must be provided along with a telephone number. The Secretary of State will furnish information not later than the 15<sup>th</sup> day after the date the request is received. (Texas Election Code, Section 18.066).

Please retain a copy of this form for your records. Please include a \$75.00 deposit fee with your request, made payable to the Secretary of State's Office. The Secretary of State will furnish the information not later than the 15th day after the date the request is received. Your order will not be released until full payment is received. The attached affidavit must be signed before a notary public and accompany all requests.

If you have any questions, please contact Elections Division at (512) 463-5650 or toll free at 1-800-252-VOTE (8683).

Affidavit

~~THE STATE OF TEXAS~~ District of Columbia: SS

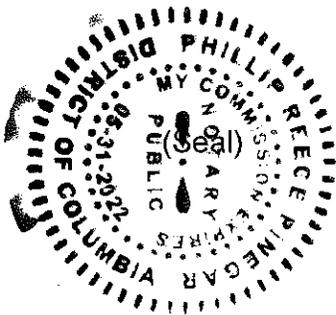
~~COUNTY OF~~ \_\_\_\_\_

Before me, the undersigned authority, on this day personally appeared  
Non Williams, who being duly sworn, deposes and says:

I do solemnly swear that the information obtained from the copy of the State Master Voter File will not be used to advertise or promote commercial products or services.

[Signature]  
Signature

Sworn to and Subscribe before me, this the 7 day of Sept., 2017.



[Signature]  
Notary Public in and for the State of Texas

Phillip R. Pinegar  
Printed Name of Notary

My commission Expires: 5-31-2022

**PLEASE BE ADVISED**

**§ 18.067. Unlawful Use of Master File Information**

(a) A person commits an offense if the person uses information in connection with advertising or promoting commercial products or services that the person knows was obtained under Section 18.066.

(b) An offense under this section is a Class A misdemeanor.

Acts 1985, 69th Leg., ch. 211, § 1, eff. Jan. 1, 1986.

Amended by Acts 1997, 75th Leg., ch. 864, § 13, eff. Sept. 1, 1997.

## EXHIBIT 2

# The State of Texas



Elections Division  
P.O. Box 12060  
Austin, Texas 78711-2060  
www.sos.state.tx.us

Phone: 512-463-5650  
Fax: 512-475-2811  
Dial 7-1-1 For Relay Services  
(800) 252-VOTE (8683)

Secretary of State

**For Internal Use Only**  
Receipt date: \_\_\_/\_\_\_/\_\_\_  
PIR-Log number: \_\_\_\_\_

## VOTER REGISTRATION PUBLIC INFORMATION REQUEST FORM

**Media must be completed:**

**Media**  
 CD-ROM  
 FTP - Provide FTP information:  
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Login: \_\_\_\_\_  
Password: \_\_\_\_\_

**Format being provided**  
Voter registration list (individual records)  
in zipped fixed width text file(s). See the  
attached record layout.

**Requestor name:**  
Ron Williams  
**(required)**

**Flagging Options ONLY**  
 Hispanic surname flag notation

**Voters may be extracted by**  
*Please checkmark all that apply to the request:*

Include Active Voters  
 Include Suspense Voters  
 Include Cancelled Voters

**I would like my data reduced to the following**  
*Please checkmark all that apply to the request:*

Only voters with Texas mailing address  
 Only voters who are effective to vote between  
\_\_\_\_\_ and \_\_\_\_\_ dates  
 Only voters between the age \_\_\_\_ and \_\_\_\_  
 Hispanic Surnames only  
 Males only  
 Females only  
 Voters who Voted in the following Elections:  
 Entire State  Counties listed below only

**Elections and Years:**  
General Election (11/07/2006; 11/04/2008; 11/02/2010; 11/06/2012; 11/04/2014; 11/08/2016)  
\_\_\_\_\_  
\_\_\_\_\_

A "suspense voter" is a voter known to have an incorrect or outdated address. The county has sent the voter a form to obtain a new current address, but no response has been received. The voter is however, considered to be an active voter for voting purposes.

If the entire state is requested, mark the space provided. If a district or county is requested, list the district number or county (write "All" by the county name to indicate all precincts). Otherwise, for partial district, county or other requests, please list the county names and applicable precinct numbers.

**COUNTY NAME(S) or DISTRICT NUMBER(S)**      Check if entire State

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

NOTE: For requests in addition to the options provided on this form, please email [elections@sos.texas.gov](mailto:elections@sos.texas.gov), as a data manipulation estimate may need to be provided for you.

<b>For Internal Use Only</b>		
First Reviewer: _____	Date reviewed: ___/___/___	EFM: _____
Second Reviewer: _____	Date reviewed: ___/___/___	Date processed: ___/___/___
Completion date: ___/___/___		

## PUBLIC INFORMATION REQUEST FORM DETAILS AND INSTRUCTIONS

### Send Order to:

Ron Williams, Policy Advisor

Presidential Advisory Commission on Election Integrity

1650 Pennsylvania Ave., NW, EEOB-Rm. 268, Washington, DC 20504

Telephone (202) 881-7807

### Send Statement to:

Kris L. Palmer, Program Analyst

General Services Administration

1800 F Street, N.W., Washington, DC 20405

Telephone (202) 501-0525

Below are the procedures for filling out the attached Public Information Request form. Failure to adequately complete the form may cause incorrect information or could delay the processing of your order.

1. Media Selection: CD-ROM or FTP. If selecting an FTP please provide FTP site, login and password information.
2. Format: Voter registration list (individual records) in zipped fixed width text file(s). See the attached record layout.
3. Extracts & Data Reduction- Options may be selected to select a limited group of voters. Additional extract requests may result in data manipulation, which would result in additional charges. Section 552.231 of the Texas Government Code requires that agencies send a written statement about the cost of potentially manipulating data to any requestor. Should it be determined that your request will require data manipulation, then a statement of the estimated cost of providing the information in the requested form will be supplied to you within the timeframe outlined in section 552.231.
4. In the area for county name(s) or District Number(s), please note the following: **If the entire state is requested**, mark the space provided. **If a district or county is requested**, list the district number or county (write "All" by the county name to indicate all precincts). Otherwise, for partial district, county or other requests, please list the county names and applicable precinct numbers.
5. The attached affidavit must be signed before a notary public. A \$75.00 deposit must accompany each request. If the request is from a Member of the House or Senate, the Member must submit the request through the appropriate business office for approval of funds **before** submitting it to this office, unless the request is being paid for out of personal funds. CD-ROM will not be released and/or files will not be uploaded to the FTP until full payment is received. A complete address (No P. O. Box) must be provided along with a telephone number. The Secretary of State will furnish information not later than the 15<sup>th</sup> day after the date the request is received. (Texas Election Code, Section 18.066).

Please retain a copy of this form for your records. Please include a \$75.00 deposit fee with your request, made payable to the Secretary of State's Office. The Secretary of State will furnish the information not later than the 15th day after the date the request is received. Your order will not be released until full payment is received. The attached affidavit must be signed before a notary public and accompany all requests.

If you have any questions, please contact Elections Division at (512) 463-5650 or toll free at 1-800-252-VOTE (8683).

Affidavit

~~THE STATE OF TEXAS~~ District of Columbia: SS

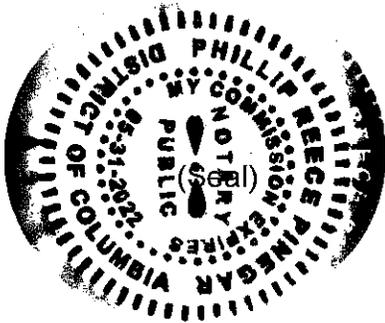
~~COUNTY OF~~ \_\_\_\_\_

Before me, the undersigned authority, on this day personally appeared  
Ron Williams \_\_\_\_\_, who being duly sworn, deposes and says:

I do solemnly swear that the information obtained from the copy of the State Master Voter File will not be used to advertise or promote commercial products or services.

  
\_\_\_\_\_  
Signature

Sworn to and Subscribe before me, this the 13 day of Sept., 2017.



  
\_\_\_\_\_  
Notary Public in and for the State of Texas  
District of Columbia

Phillip R. Pinegar  
\_\_\_\_\_  
Printed Name of Notary

My commission Expires: 5-31-2022

**PLEASE BE ADVISED**

**§ 18.067. Unlawful Use of Master File Information**

(a) A person commits an offense if the person uses information in connection with advertising or promoting commercial products or services that the person knows was obtained under Section 18.066.

(b) An offense under this section is a Class A misdemeanor.

Acts 1985, 69th Leg., ch. 211, § 1, eff. Jan. 1, 1986.

Amended by Acts 1997, 75th Leg., ch. 864, § 13, eff. Sept. 1, 1997.

Velva L. Price  
District Clerk  
Travis County  
D-1-GN-17-003451  
Irene Silva

No. D-1-GN-17-003451

LEAGUE OF WOMEN VOTERS OF TEXAS,	§	IN THE DISTRICT COURT
TEXAS STATE CONFERENCE OF THE	§	
NATIONAL ASSOCIATION FOR THE	§	
ADVANCEMENT OF COLORED PEOPLE	§	
(NAACP) and RUTHANN GEER,	§	
	§	
<i>Plaintiffs,</i>	§	
	§	
vs.	§	TRAVIS COUNTY, TEXAS
	§	
ROLANDO PABLOS, Secretary of State For the	§	
State of Texas, and KEITH INGRAM, Director,	§	
Texas Elections Division of the Secretary of State,	§	
	§	
<i>Defendants.</i>	§	98 <sup>th</sup> JUDICIAL DISTRICT

**PLAINTIFFS’ APPLICATION FOR TEMPORARY RESTRAINING ORDER AND TEMPORARY INJUNCTION**

Pursuant to Tex. R. Civ. P. 680 and 681, Plaintiffs in the above-captioned matter hereby move the Court to issue a Temporary Restraining Order and Temporary Injunction enjoining Defendants Rolando Pablos and Keith Ingram from releasing information from the State of Texas’s Computerized Voter Registration List (the “Voter List”) to the Presidential Advisory Commission on Election Integrity (the “Commission”), and to take all actions necessary to maintain the status quo ante pending a determination on the merits.

## FACTS

### *Background on this action*

1. Plaintiffs filed the above-captioned action on July 20, 2017, seeking to prevent Defendants from releasing the Voter List to the Commission without the Commission first complying with all aspects of Tex. Elec. Code § 18.066, *et seq.*, including protections against the commercial use of Voter List information.
2. Plaintiffs also filed this action to prevent the release of birth dates of part of the Voter List in violation of Tex. Gov't Code § 552.101 and Texas law generally.

### *Privacy protections for voter data under Texas law*

3. Texas law prohibits the use of the Voter List “in connection with advertising or promoting commercial products or services,” which is classified as a Class A misdemeanor. Tex. Elec. Code § 18.067.
4. The importance of this law is reinforced by the requirement that any request for voter information must be accompanied by “an affidavit to the secretary stating that the person will not use the information obtained in connection with advertising or promoting commercial products or services.” Tex. Elec. Code § 18.066(d).

5. Additionally, Texas law prohibits the Secretary of State from releasing (i) any voter's social security number; or (ii) certain residential addresses. Tex. Elec. Code § 18.066(b).
6. Texas courts have recognized a “nontrivial privacy interest” in birth dates. *See Paxton v. City of Dallas*, No. 03-13-00546-CV, 2015 WL 3394061, at \*3 (Tex. App. May 22, 2015) (concluding that “public citizens have a privacy interest in their birth dates”), *review denied* (Sept. 4, 2015); *Tex. Comptroller of Pub. Accounts v. Att’y Gen. of Tex.*, 354 S.W.3d 336, 346-48 (Tex. 2010) (holding that disclosure of state employee birth dates constituted a “clearly unwarranted invasion of personal privacy”); *see also* Tex. Att’y Gen. Op. OR2017-06026 (2017) (“Based on *Texas Comptroller*, the court of appeals [in *City of Dallas*] concluded the privacy rights of public employees apply equally to public citizens, and thus, public citizens’ dates of birth are also protected by common-law privacy . . . .”). In doing so, courts have recognized the derivative harm arising from the release of information, including the threat that the disclosure of birth dates, along with other information, could be used for identity theft. Specifically, the Texas Supreme Court acknowledged in *Texas Comptroller* that the disclosure of “[birth] dates, when combined with name and place of birth, can reveal social security numbers.” 354 S.W.3d at 345.

*The Commission's requests for voter data*

7. The Commission was established by President Donald Trump through Executive Order 13,799. Its stated mission is to “study the registration and voting processes used in Federal elections,” and to issue a report that addresses, *inter alia*, (i) “those laws, rules, policies, activities, strategies, and practices” that either “enhance” or “undermine the American people’s confidence in the integrity of the voting processes used in Federal elections;” and (ii) “vulnerabilities in voting systems and practices used for Federal elections that could lead to improper voter registrations and improper voting, including fraudulent voter registrations and fraudulent voting.” Exec. Order No. 13,799, 82 Fed. Reg. 22,389 (May 16, 2017).
8. On June 28, 2017, the Commission sent letters to all 50 states (and the District of Columbia), including Texas, seeking a wide range of information pertaining to each state’s voters, including name, address, demographic information, partial social security numbers, party affiliations, criminal felony convictions, registration and voting histories, and more. In doing so, the Commission clearly stated that any information sent to it would become public. The Commission initially requested that Texas and the other states respond by July 14, 2017.

9. On July 26, 2017, the Commission sent a second letter to all fifty states and the District of Columbia seeking voter data, including to Defendant Pablos. In this letter, the Commission purported to protect “any personally identifiable information” from the data it received.
10. On September 7, 2017, the Commission submitted to Defendants a request for voter data using the Secretary of State’s official form, known as the Texas Voter Registration Public Information Request Form. The request seeks data for the entire state, including “active,” “suspense,” and “cancelled” voters.
11. On September 13, 2017, the Commission submitted to Defendants a revised request for voter data using the Texas Voter Registration Public Information Request Form.
12. On information and belief, Defendants intend to respond to the Commission’s request and provide Texas voters’ data by September 28, 2017.

*Transparency requirements in federal law*

13. As an advisory committee covered under the Federal Advisory Committee Act (FACA), 5 U.S.C. § App. 2, the Commission must make available for inspection all “the records, reports, . . . or other documents which were

made available” to it unless those records fall within one of the enumerated exceptions. 5 U.S.C. App. 2 § 10(b).

14. Indeed, the Commission has already been sued to compel its compliance with FACA’s transparency requirements. *See Lawyers’ Committee for Civil Rights Under Law v. Presidential Advisory Commission on Election Integrity, et al.*, No. 1:17-cv-01354 (D.D.C. July 10, 2017).

15. The Commission has submitted the Texas Voter Registration Public Information Request Form, but that form does not contemplate a scenario in which the requester is governed by a statute with disclosure requirements like those set forth in FACA.

16. On information and belief, the Commission has made no public representations as to how it will ensure the privacy of the Voter List while maintaining compliance with FACA.

*The risk of harm to Plaintiffs*

17. Plaintiff League of Women Voters of Texas consists of over 2,000 members, the vast majority of whom are Texas residents who are registered to vote in the state. Their personal information, including names, addresses, and dates of birth, is included in the Voter List that the Secretary of State intends to release to the Commission.

18. Plaintiff Ruthann Geer is a registered Texas voter whose personal information, including name, address, and date of birth, is included in the Voter List that the Secretary of State intends to release to the Commission.
19. The identifying information on the Voter List, if made public, may be used to solicit, harass, or otherwise infringe upon the privacy of Texas voters, including the League's members and Ruthann Geer.
20. That same information, if made public, could lead to Plaintiffs' and Texas voters' information being used by others for commercial purposes in violation of Tex. Elec. Code § 18.067. State law specifically contemplates this harm and sets out the prohibition against commercial use in response.
21. If Defendants release the Voter List to the Commission, the League will be forced to redirect its resources away from its civic engagement activities and toward addressing the consequences of that action. The release of the Voter List will also make it substantially more difficult for the League to engage in voter-registration and get-out-the-vote activities, which they regularly perform in support of their civic-engagement mission. Voters and prospective voters will be more reluctant to participate in elections or register to vote in the future if they understand that the Defendants are willing to provide information on the Voter List to entities who

openly admit that they intend to make such information public, or may be compelled to do so. The public disclosure of such personal information will chill League members' as well as other voters' and prospective voters' exercise of First Amendment rights including the right to vote and freedom of association.

22. Once Defendants transmit the Voter List to the Commission, as will happen imminently absent court action, all of the implicated privacy and commercial use considerations become active concerns. Once in possession of the Voter List, the Commission could at any point release it intentionally, be compelled to release it, or have it stolen. The harm to Plaintiffs would be irreversible. But Defendants suffer no harm from withholding the release of the Voter List and maintaining the status quo while this matter is resolved.
23. The facts essential to injunctive relief are sworn to in the attached affidavits of Elaine Wiant, Ruthann Geer and Tomas Lopez.

### **PRAYER FOR RELIEF**

WHEREFORE, the Plaintiffs request the following relief and judgment:

- A. A temporary restraining order in favor of Plaintiffs and against the Defendants, and entry of a temporary injunction enjoining the Defendants, Secretary of State Rolando Pablos, and Keith Ingram, Director, Texas Elections Division, from providing the Voter List

and any part thereof to the Commission, and to take all actions necessary to maintain the status quo ante pending a determination on the merits.

- B. Such other and further relief as the Court deems just in the premises.

Respectfully submitted,

LAW OFFICE OF CHARLES McGARRY

*/s/ Charles W. McGarry*

---

Charles W. McGarry  
Texas Bar No. 13610650  
701 Commerce Street, Suite 400  
Dallas, Texas 75202  
(214) 748-0800  
(214) 748-9449 fax  
cmcgarry@ix.netcom.com

Myrna Pérez, Esq.  
Tomas Lopez, Esq.  
**Brennan Center for Justice**  
120 Broadway, Suite 1750  
New York, NY 10271  
(646) 292-8310 phone  
(212) 463-7308 fax  
[myrna.perez@nyu.edu](mailto:myrna.perez@nyu.edu)  
[wendy.weiser@nyu.edu](mailto:wendy.weiser@nyu.edu)  
[tomas.lopez@nyu.edu](mailto:tomas.lopez@nyu.edu)  
*(Applications for admission  
pro hac vice forthcoming)*

Daniel T. Donovan, Esq.  
Susan M. Davies, Esq.  
Michael A. Glick, Esq.  
**Kirkland & Ellis LLP**  
655 Fifteenth Street, N.W.  
Washington, DC 20005  
(202) 879-5000 phone  
(202) 879-5200 fax  
[daniel.donovan@kirkland.com](mailto:daniel.donovan@kirkland.com)  
[susan.davies@kirkland.com](mailto:susan.davies@kirkland.com)  
[michael.glick@kirkland.com](mailto:michael.glick@kirkland.com)  
*(Applications for admission pro hac vice  
forthcoming)*

ATTORNEYS FOR PLAINTIFFS

LOCAL RULE CERTIFICATION

This Application will not be presented *ex parte*. It is being served in accordance with the Certificate of Service, below, and opposing counsel will be notified of the time and place of hearing.

/s/ Charles W. McGarry

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of this instrument was delivered to the following attorney of record on this 21<sup>st</sup> day of September, 2017, in accordance with the Texas Rules of Civil Procedure:

Esteban S.M. Soto  
Assistant Attorney General  
General Litigation Division  
Office of the Attorney General  
300 West 15th Street  
Austin, TX 78701  
Phone: 512-475-4054  
Fax: 512-320-0667  
Esteban.Soto@oag.texas.gov

/s/ Charles W. McGarry  
Charles W. McGarry

LEAGUE OF WOMEN VOTERS OF TEXAS,	§	IN THE DISTRICT COURT
TEXAS STATE CONFERENCE OF THE	§	
NATIONAL ASSOCIATION FOR THE	§	
ADVANCEMENT OF COLORED PEOPLE	§	
(NAACP) and RUTHANN GEER,	§	
	§	
<i>Plaintiffs,</i>	§	
	§	
vs.	§	TRAVIS COUNTY, TEXAS
	§	
ROLANDO PABLOS, Secretary of State For the	§	
State of Texas, and KEITH INGRAM, Director,	§	
Texas Elections Division of the Secretary of State,	§	
	§	
<i>Defendants.</i>	§	98 <sup>th</sup> JUDICIAL DISTRICT

**AFFIDAVIT OF ELAINE WIAIT IN SUPPORT OF PLAINTIFFS' APPLICATION FOR A TEMPORARY RESTRAINING ORDER AND TEMPORARY INJUNCTION**

I affirm the following to be true under the penalties of perjury:

1. I am the President of the League of Women Voters of Texas. I have served in this capacity since June 1, 2014.
2. In my capacity as President of the League of Women Voters of Texas, I coordinate the activities of our local Leagues on a number of statewide matters. I communicate regularly with local Leagues on their voter registration and voter education activities.
3. The League is a nonpartisan political organization that encourages informed and active participation in government, and fights to improve our systems of government and to impact public policies. Our organization's main purpose is to encourage people to vote, keep them informed as voters, and also seek out information from candidates and public officials to serve the electorate and citizenry.

4. The League executes its civic engagement mission in a number of ways, including through voter registration and get-out-the-vote activities. Last year, the League, through its twenty-five local chapters, conducted at least two hundred voter registration drives.
5. The League has over 2,000 members, the vast majority of which are Texas residents who are registered to vote in the state. Their information is included in the voter list that the Secretary of State intends to release to the Presidential Advisory Commission on Election Integrity.
6. If the Secretary of State is permitted to provide voter data to the Commission, the personal information of League members will be included in any data set released. I understand this to include, among other things, names; residence and postal addresses; and dates of birth.
7. I am concerned about the harm that will result if League members' personal information is handed over to the Commission, especially as it relates to the impairment of their privacy.
8. I specifically fear that the Commission will make personal information public, as it initially promised, that it will be forced to make that information public by law, or that hackers will access that data.
9. Regardless of the way in which this information is made public, I am concerned that League members could be subject to harassment and intimidation by those who may oppose their viewpoints or participation in our organization. I worry that the public release of names, addresses, and birth dates, among other details, would allow malicious individuals to reach individuals directly or otherwise use that information to harass them.

10. I am also concerned about the vulnerability of League members' personal information to identity thieves. I understand that the Commission has not promised the Secretary of State that it would use specific security measures to protect individuals' information.
11. Furthermore, if Texans' personal information is released, our organization will be forced to redirect its resources away from its civic engagement activities and toward addressing the consequences of the Secretary of State's action. I believe that voters and prospective voters will be more reluctant to participate in elections or register to vote in the future if they understand that the Secretary of State is willing to provide their personal information to entities who openly admit that they intend to make such information public. The League will therefore expend more time and attention educating and assisting Texas citizens with regard to the protection (or, in this case, non-protection) of their personal information.
12. I understand that whenever the Commission makes personal information public, whether deliberately or otherwise, it will be effectively impossible to get back. This harm cannot be undone.
13. If the Secretary of State is permitted to provide League members' personal information, including dates of birth, to the Commission, that information will be immediately vulnerable to both security breaches and its deliberate or compelled release.

Executed this   19   day of September 2017.



Elaine Wiant  
President, League of Women Voters of Texas



5. I specifically fear that the Commission will make my personal information public, as it initially promised, that it will be forced to make my information public by law, or that hackers will access that data.
6. Regardless of the way in which my information is made public, I fear that I could be subject to harassment and intimidation by those who may oppose my viewpoints or participation in the League of Women Voters. I worry that the public release of my name, address, and date of birth, among other details, would allow malicious individuals to reach me directly or otherwise use that information to harass me. I am especially concerned about this because I live alone in a rural part of the state.
7. I am also concerned about the vulnerability of my personal information to identity thieves. I understand that the Commission has not promised the Secretary of State that it would use specific security measures to protect my and other people's information.
8. I understand that whenever the Commission makes my personal information public, whether deliberately or otherwise, it will be effectively impossible to get back. This harm cannot be undone.
9. If the Secretary of State is permitted to provide my personal information, including my date of birth, to the Commission, that information will be immediately vulnerable to both security breaches and its deliberate or compelled release.

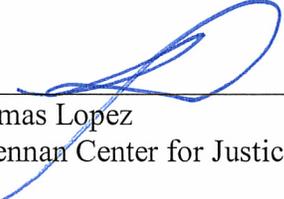
Executed this 20<sup>th</sup> day of September 2017.

  
Ruthann Geer



5. On September 19, 2017, Defendants' counsel informed Plaintiffs' counsel that Defendants received a revised "Voter Registration Public Information Request Form" dated September 13 from Ron Williams. Defendants' counsel also provided Plaintiffs' counsel with a digital copy of this form, which also included an affidavit submitted by Mr. Williams.
6. This second form and affidavit are attached hereto Exhibit 2.
7. Pursuant to representations made by Defendants' counsel, it is our understanding that, absent an injunction, Defendants will provide the requested voter information to the Commission within fifteen days of the receipt of the revised request form, or on or before September 28, 2017.

Executed this 20<sup>th</sup> day of September 2017.

  
\_\_\_\_\_  
Tomas Lopez  
Brennan Center for Justice at NYU School of Law

# EXHIBIT 1

# The State of Texas



Elections Division  
P.O. Box 12060  
Austin, Texas 78711-2060  
www.sos.state.tx.us

Phone: 512-463-5650  
Fax: 512-475-2811  
Dial 7-1-1 For Relay Services  
(800) 252-VOTE (8683)

Secretary of State

**For Internal Use Only**  
Receipt date: \_\_\_/\_\_\_/\_\_\_  
PIR-Log number: \_\_\_\_\_

## VOTER REGISTRATION PUBLIC INFORMATION REQUEST FORM

**Media must be completed:**

**Media**

- CD-ROM
- FTP - Provide FTP information:

FTP site: \_\_\_\_\_  
Login: \_\_\_\_\_  
Password: \_\_\_\_\_

**Format being provided**

Voter registration list (individual records) in zipped fixed width text file(s). See the attached record layout.

**Requestor name:**

Ron Williams

**(required)**

**Flagging Options ONLY**

- Hispanic surname flag notation

**Voters may be extracted by**

*Please checkmark all that apply to the request:*

- Include Active Voters
- Include Suspense Voters
- Include Cancelled Voters

**I would like my data reduced to the following**

*Please checkmark all that apply to the request:*

- Only voters with Texas mailing address
- Only voters who are effective to vote between \_\_\_\_\_ and \_\_\_\_\_ dates
- Only voters between the age \_\_\_\_\_ and \_\_\_\_\_
- Hispanic Surnames only
- Males only
- Females only
- Voters who Voted in the following Elections:  
 Entire State  Counties listed below only

**Elections and Years:**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

A "suspense voter" is a voter known to have an incorrect or outdated address.

The county has sent the voter a form to obtain a new current address, but no response has been received. The voter is however, considered to be an active voter for voting purposes.

If the entire state is requested, mark the space provided. If a district or county is requested, list the district number or county (write "All" by the county name to indicate all precincts). Otherwise, for partial district, county or other requests, please list the county names and applicable precinct numbers.

**COUNTY NAME(S) or DISTRICT NUMBER(S)**      Check if entire State

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

NOTE: For requests in addition to the options provided on this form, please email [elections@sos.texas.gov](mailto:elections@sos.texas.gov), as a data manipulation estimate may need to be provided for you.

<b><u>For Internal Use Only</u></b>		
First Reviewer: _____	Date reviewed: ___/___/___	EFM: _____
Second Reviewer: _____	Date reviewed: ___/___/___	Date processed: _____
Completion date: ___/___/___		

## PUBLIC INFORMATION REQUEST FORM DETAILS AND INSTRUCTIONS

### Send Order to:

Ron Williams, Policy Advisor

Presidential Advisory Commission on Election Integrity

1650 Pennsylvania Ave., NW, EEOB-Rm. 268, Washington, DC 20504

Telephone (202) 881-7807

### Send Statement to:

Kris L. Palmer, Program Analyst

General Services Administration

1800 F Street, NW, Washington, D.C. 20405

Telephone (202) 501-0525

Below are the procedures for filling out the attached Public Information Request form. Failure to adequately complete the form may cause incorrect information or could delay the processing of your order.

1. Media Selection: CD-ROM or FTP. If selecting an FTP please provide FTP site, login and password information.
2. Format: Voter registration list (individual records) in zipped fixed width text file(s). See the attached record layout.
3. Extracts & Data Reduction- Options may be selected to select a limited group of voters. Additional extract requests may result in data manipulation, which would result in additional charges. Section 552.231 of the Texas Government Code requires that agencies send a written statement about the cost of potentially manipulating data to any requestor. Should it be determined that your request will require data manipulation, then a statement of the estimated cost of providing the information in the requested form will be supplied to you within the timeframe outlined in section 552.231.
4. In the area for county name(s) or District Number(s), please note the following: **If the entire state is requested**, mark the space provided. **If a district or county is requested**, list the district number or county (write "All" by the county name to indicate all precincts). Otherwise, for partial district, county or other requests, please list the county names and applicable precinct numbers.
5. The attached affidavit must be signed before a notary public. A \$75.00 deposit must accompany each request. If the request is from a Member of the House or Senate, the Member must submit the request through the appropriate business office for approval of funds **before** submitting it to this office, unless the request is being paid for out of personal funds. CD-ROM will not be released and/or files will not be uploaded to the FTP until full payment is received. A complete address (No P. O. Box) must be provided along with a telephone number. The Secretary of State will furnish information not later than the 15<sup>th</sup> day after the date the request is received. (Texas Election Code, Section 18.066).

Please retain a copy of this form for your records. Please include a \$75.00 deposit fee with your request, made payable to the Secretary of State's Office. The Secretary of State will furnish the information not later than the 15th day after the date the request is received. Your order will not be released until full payment is received. The attached affidavit must be signed before a notary public and accompany all requests.

If you have any questions, please contact Elections Division at (512) 463-5650 or toll free at 1-800-252-VOTE (8683).

Affidavit

~~THE STATE OF TEXAS~~ District of Columbia: SS

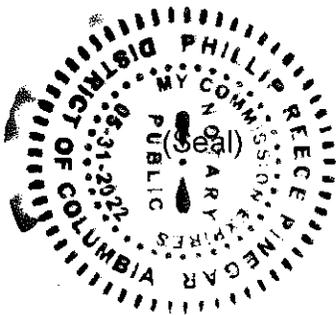
~~COUNTY OF~~ \_\_\_\_\_

Before me, the undersigned authority, on this day personally appeared  
Non Williams, who being duly sworn, deposes and says:

I do solemnly swear that the information obtained from the copy of the State Master Voter File will not be used to advertise or promote commercial products or services.

[Signature]  
Signature

Sworn to and Subscribe before me, this the 7 day of Sept., 2017.



[Signature]  
Notary Public in and for the State of Texas

Phillip R. Pinegar  
Printed Name of Notary

My commission Expires: 5-31-2022

**PLEASE BE ADVISED**

**§ 18.067. Unlawful Use of Master File Information**

(a) A person commits an offense if the person uses information in connection with advertising or promoting commercial products or services that the person knows was obtained under Section 18.066.

(b) An offense under this section is a Class A misdemeanor.

Acts 1985, 69th Leg., ch. 211, § 1, eff. Jan. 1, 1986.

Amended by Acts 1997, 75th Leg., ch. 864, § 13, eff. Sept. 1, 1997.

## EXHIBIT 2

# The State of Texas



Elections Division  
P.O. Box 12060  
Austin, Texas 78711-2060  
www.sos.state.tx.us

Phone: 512-463-5650  
Fax: 512-475-2811  
Dial 7-1-1 For Relay Services  
(800) 252-VOTE (8683)

Secretary of State

**For Internal Use Only**  
Receipt date: \_\_\_/\_\_\_/\_\_\_  
PIR-Log number: \_\_\_\_\_

## VOTER REGISTRATION PUBLIC INFORMATION REQUEST FORM

**Media must be completed:**

**Media**

- CD-ROM  
 FTP - Provide FTP information:

FTP site: \_\_\_\_\_  
Login: \_\_\_\_\_  
Password: \_\_\_\_\_

**Format being provided**

Voter registration list (individual records) in zipped fixed width text file(s). See the attached record layout.

**Requestor name:**

Ron Williams  
\_\_\_\_\_  
**(required)**

**Flagging Options ONLY**

- Hispanic surname flag notation

**Voters may be extracted by**

*Please checkmark all that apply to the request:*

- Include Active Voters  
 Include Suspense Voters  
 Include Cancelled Voters

**I would like my data reduced to the following**

*Please checkmark all that apply to the request:*

- Only voters with Texas mailing address  
 Only voters who are effective to vote between \_\_\_\_\_ and \_\_\_\_\_ dates  
 Only voters between the age \_\_\_\_ and \_\_\_\_  
 Hispanic Surnames only  
 Males only  
 Females only  
 Voters who Voted in the following Elections:

- Entire State  Counties listed below only

**Elections and Years:**

General Election (11/07/2006; 11/04/2008; 11/02/2010; 11/06/2012; 11/04/2014; 11/08/2016)

\_\_\_\_\_  
\_\_\_\_\_

A "suspense voter" is a voter known to have an incorrect or outdated address.

The county has sent the voter a form to obtain a new current address, but no response has been received. The voter is however, considered to be an active voter for voting purposes.

If the **entire state is requested**, mark the space provided. If a **district or county is requested**, list the district number or county (write "All" by the county name to indicate all precincts). Otherwise, for partial district, county or other requests, please list the county names and applicable precinct numbers.

**COUNTY NAME(S) or DISTRICT NUMBER(S)**      Check if entire State

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

NOTE: For requests in addition to the options provided on this form, please email [elections@sos.texas.gov](mailto:elections@sos.texas.gov), as a data manipulation estimate may need to be provided for you.

<b>For Internal Use Only</b>		
First Reviewer: _____	Date reviewed: ___/___/___	EFM: _____
Second Reviewer: _____	Date reviewed: ___/___/___	Date processed: ___/___/___
Completion date: ___/___/___		

## PUBLIC INFORMATION REQUEST FORM DETAILS AND INSTRUCTIONS

### Send Order to:

Ron Williams, Policy Advisor

Presidential Advisory Commission on Election Integrity

1650 Pennsylvania Ave., NW, EEOB-Rm. 268, Washington, DC 20504

Telephone (202) 881-7807

### Send Statement to:

Kris L. Palmer, Program Analyst

General Services Administration

1800 F Street, N.W., Washington, DC 20405

Telephone (202) 501-0525

Below are the procedures for filling out the attached Public Information Request form. Failure to adequately complete the form may cause incorrect information or could delay the processing of your order.

1. Media Selection: CD-ROM or FTP. If selecting an FTP please provide FTP site, login and password information.
2. Format: Voter registration list (individual records) in zipped fixed width text file(s). See the attached record layout.
3. Extracts & Data Reduction- Options may be selected to select a limited group of voters. Additional extract requests may result in data manipulation, which would result in additional charges. Section 552.231 of the Texas Government Code requires that agencies send a written statement about the cost of potentially manipulating data to any requestor. Should it be determined that your request will require data manipulation, then a statement of the estimated cost of providing the information in the requested form will be supplied to you within the timeframe outlined in section 552.231.
4. In the area for county name(s) or District Number(s), please note the following: **If the entire state is requested**, mark the space provided. **If a district or county is requested**, list the district number or county (write "All" by the county name to indicate all precincts). Otherwise, for partial district, county or other requests, please list the county names and applicable precinct numbers.
5. The attached affidavit must be signed before a notary public. A \$75.00 deposit must accompany each request. If the request is from a Member of the House or Senate, the Member must submit the request through the appropriate business office for approval of funds **before** submitting it to this office, unless the request is being paid for out of personal funds. CD-ROM will not be released and/or files will not be uploaded to the FTP until full payment is received. A complete address (No P. O. Box) must be provided along with a telephone number. The Secretary of State will furnish information not later than the 15<sup>th</sup> day after the date the request is received. (Texas Election Code, Section 18.066).

Please retain a copy of this form for your records. Please include a \$75.00 deposit fee with your request, made payable to the Secretary of State's Office. The Secretary of State will furnish the information not later than the 15th day after the date the request is received. Your order will not be released until full payment is received. The attached affidavit must be signed before a notary public and accompany all requests.

If you have any questions, please contact Elections Division at (512) 463-5650 or toll free at 1-800-252-VOTE (8683).

Affidavit

~~THE STATE OF TEXAS~~ District of Columbia: SS

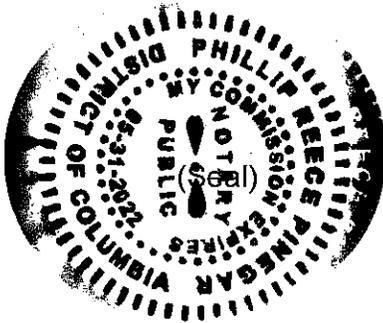
~~COUNTY OF~~ \_\_\_\_\_

Before me, the undersigned authority, on this day personally appeared  
Ron Williams \_\_\_\_\_, who being duly sworn, deposes and says:

I do solemnly swear that the information obtained from the copy of the State Master  
Voter File will not be used to advertise or promote commercial products or services.

  
\_\_\_\_\_  
Signature

Sworn to and Subscribe before me, this the 13 day of Sept., 2017.



  
\_\_\_\_\_  
Notary Public in and for the State of Texas  
District of Columbia

Phillip R. Pinegar  
\_\_\_\_\_  
Printed Name of Notary

My commission Expires: 5-31-2022

**PLEASE BE ADVISED**

**§ 18.067. Unlawful Use of Master File Information**

(a) A person commits an offense if the person uses information in connection with advertising or promoting commercial products or services that the person knows was obtained under Section 18.066.

(b) An offense under this section is a Class A misdemeanor.

Acts 1985, 69th Leg., ch. 211, § 1, eff. Jan. 1, 1986.

Amended by Acts 1997, 75th Leg., ch. 864, § 13, eff. Sept. 1, 1997.

CAUSE NO. D-1-GN-17-003451

LEAGUE OF WOMEN VOTERS OF	§	IN THE DISTRICT COURT OF
TEXAS, TEXAS STATE CONFERENCE	§	
OF THE NATIONAL ASSOCIATION	§	
FOR THE ADVANCEMENT OF	§	
COLORED PEOPLE (NAACP) and	§	
RUTHANN GEER,	§	TRAVIS COUNTY, TEXAS
<i>Plaintiffs,</i>	§	
	§	
v.	§	
	§	
ROLANDO PABLOS, Secretary of State	§	
for the State of Texas, and KEITH	§	
INGRAM, Director, Texas Elections	§	98 <sup>TH</sup> JUDICIAL DISTRICT
Division of the Secretary of State,	§	
<i>Defendants.</i>	§	
	§	

**DEFENDANTS’ PLEA TO THE JURISDICTION**

TO THE HONORABLE JUDGE OF THIS COURT:

Defendants, Rolando Pablos, Secretary of State for the State of Texas, and Keith Ingram, Director, Texas Elections Division of the Secretary of State (collectively, “Defendants”) file this Plea to the Jurisdiction and would respectfully show the Court the following:

**INTRODUCTION**

This lawsuit challenges the Secretary of State’s (“SOS”) production of public information in response to a request for information made by the Presidential Advisory Commission on Election Integrity (the “Commission”). Pursuant to the controlling statute, Texas Election Code § 18.066, the SOS is required to produce information from the statewide computerized voter registration list—subject only to limited, enumerated exceptions—to any requestor who complies with the statute’s procedures. The SOS intends to follow State law in response to the Commission’s request—no more, no less—just as it has in the past with similar requests from individuals and organizations from across the political spectrum.

This case represents a classic example of a plaintiff suing the wrong party under the wrong cause of action. In their Second Amended Petition, Plaintiffs bring claims under Chapter 37 of the Texas Civil Practice and Remedies Code (“UDJA”) alleging that Defendants’ actions violate section 18.066 of the Election Code and section 552.101 of the Texas Government Code (the “Texas Public Information Act” or “PIA”). But even a cursory glance at their pleadings reveals that Plaintiffs’ true grievance lies not with State actors, but with the Commission. *See, e.g.*, Plfs’ Sec. Am. Pet. at ¶ 22 (“[T]he Commission’s stated intention...would enable widespread abuse of [private voter data] to the detriment of Texas citizens.”); *id.* at ¶ 79 (“[T]he Commission’s intended use of the Voter List, as confirmed in the Commission’s Letter itself, would violate Texas law and the rights of Texas citizens.”); *id.* at ¶ 86 (“The Commission’s intended (or compelled) publication of the information provided by Texas (*and other states*) would eviscerate the requirements set forth in Tex. Elec. Code § 18.066.”) (emphasis added).

Regardless of the merits—or lack thereof—of Plaintiffs’ complaints about the federal Commission,<sup>1</sup> their allegations are insufficient to state a claim against Defendants that falls within this Court’s jurisdiction. Rather, at the very least, Plaintiffs must allege and prove that the *State Defendants* have acted outside their legal authority under State law. But there is simply no evidence that the Defendants have violated or will violate State law. Indeed, as Plaintiffs grudgingly acknowledge in their amendments to their Original Petition, the SOS has applied section 18.066’s requirements in processing the Commission’s request. *Id.* at ¶ 22 (“[T]he Commission has submitted an affidavit providing that it ‘will not use the information obtained in connection with advertising or promoting commercial products or services’...”). Nevertheless, Plaintiffs continue to proceed with this lawsuit ostensibly to ensure that the production does not violate State law. But

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<sup>1</sup> Who Plaintiffs chose not to include in this lawsuit.

their requested relief would compel the opposite result, by requiring the State to violate its own laws simply based on the fact that the request comes from the Commission. The Court should reject setting this dangerous precedent and find that Plaintiffs' claims are barred by sovereign immunity.

### **BACKGROUND**

In 2003, the Texas Legislature amended the Election Code to require the SOS to maintain a statewide computerized voter registration list. TEX. ELEC. CODE § 18.061; Acts 2003, 78th Leg., ch. 1315, Sec. 6, eff. Jan. 1, 2006. The enacted legislation took effect in 2006 and also required the SOS to produce information from the statewide computerized voter registration list to “*any person* on request not later than the 15th day after the date the request is received.” *Id.*; TEX. ELEC. CODE § 18.066 (emphasis added). In 2007 and 2009, the Legislature further amended the statute to directly address what voter information can be withheld from production under section 18.066. *Id.*; Acts 2007, 80th Leg., R.S., Ch. 594 (H.B. 41), Sec. 6, eff. September 1, 2007; Acts 2009, 81st Leg., R.S., Ch. 465 (S.B. 281), Sec. 6, eff. September 1, 2009. In its current form, the Legislature requires the SOS to withhold social security numbers and residential addresses for judges and their spouses. *Id.*

This suit arises from the Commission's request for information from the statewide computerized voter registration list. On or about June 28, 2017, the SOS received a letter from the Commission for publicly available voter registration records. *See* Ex. A-1. Shortly thereafter, the Commission requested that the State delay submitting any records until the United States District Court of the District of Columbia ruled on a pending motion that sought to prevent the Commission from receiving records. *See* Ex. A. After that motion was disposed of, the Commission sent the SOS another letter re-asserting its previous request for voter registration records. The letter

explicitly and repeatedly stated that “the Commission will not publicly release any personally identifiable information regarding any individual voter or any group of voters from the voter registration records” the SOS submits. Ex. A-1.

On September 7, 2017, the Commission formally requested the information through a “Voter Registration Public Information Request Form.” Ex. A-2. As this request constituted a request under 18.066, the SOS required the Commission to also submit an affidavit swearing under oath that the “information obtained from the State Master Voter File will not be used to advertise or promote commercial products or services.” *Id.*; *see also* TEX. ELEC. CODE § 18.066(d). Six days later the Commission submitted a re-executed request form that was amended to specifically request voter history for certain elections from 2006 onward. *Id.* Notably, the Commission submitted the required affidavit in conjunction with each request. *Id.* On September 19, 2017, the Commission paid the SOS \$3,427.00, the full amount for the cost of the file which would be charged to any other requestor requesting the file. Further, in addition to requiring the affidavit, and the payment, which it has already received, the SOS intends to follow the law in processing this request, including by withholding social security numbers and the exempted residential addresses of judges and their spouses. Ex. A.

The Commission’s request for voter information is not unusual. Indeed, the SOS responds to similar requests from requestors from across the political spectrum. *See* Ex. A-3. For instance, state and federal legislators, as well as people associated with political campaigns—both Democrat and Republican—routinely request this information to use in conjunction with elections, campaigns, and constituent outreach. University and research organization, such as Catalist and Harvard University, also request this information. Likewise, non-profit organizations, such as the Mexican American Legal Defense and Educational Fund (“MALDEF”) and the National

Association of Latino Election Officials (“NALEO”), have also requested and received this information in furtherance of their missions. Finally, federal courts routinely request this information to populate jury lists, both under section 18.066 and separate federal statutes and court order specific to jury information. Notably, Plaintiffs have never objected to the release of public voting information to these requestors. Instead, they single out the Commission and ask the Court to impose restrictions over and above—and in conflict to—what the law requires in conjunction with this specific request. But the statute in question requires the SOS to equally apply the law’s requirements to “any person” who requests information—including the Commission. TEX. ELEC. CODE § 18.066.

#### SUMMARY OF THE ARGUMENT

Plaintiffs’ claims are barred by sovereign immunity and fail as a matter of law for multiple independent reasons. *First*, Plaintiffs’ claims are barred by sovereign immunity because they have not identified a statutory waiver of immunity for any of their claims. More specifically, it is well established that the UDJA does not waive the State’s immunity by itself and neither the Election Code, nor the PIA waive the State’s immunity to allow this suit. *Second*, Plaintiffs have not alleged and cannot establish a valid ultra vires claim because it is undisputed that Defendants have acted in accordance with State law. Initially, as Plaintiffs effectively concede in their pleadings, the Election Code—not the PIA—controls the Defendants’ response to the Commission’s request as it is the more specific and later enacted statute. And, there is simply no evidence that Defendants have violated or will violate the Election Code. Rather, Plaintiffs’ attempt to have the Court condition the release of public information on additional restrictions—not found in the statute or applied to other requestors—is a blatantly improper attempt to control State action. *Third*, even if the Court holds that the PIA governs the production, the Court still lacks jurisdiction over

Plaintiffs' claims because their claims and requests for relief are redundant to those available under section 552.3215 of the PIA. For these reasons, the Court should dismiss Plaintiffs' suit with prejudice as it lacks jurisdiction adjudicate their claims.

#### LEGAL STANDARD

A plea to the jurisdiction challenges the trial court's subject matter jurisdiction to hear the case. *Bland Indep. Sch. Dist. v. Blue*, 34 S.W.3d 547, 554 (Tex. 2000). Subject matter jurisdiction is essential to the authority of a court to decide a case and is never presumed. *Tex. Ass'n of Bus. v. Tex. Air Control Bd.*, 852 S.W.2d 440, 443-44 (Tex. 1993). The plaintiff has the burden to allege facts affirmatively demonstrating that the trial court has subject matter jurisdiction. *Id.* at 446. The existence of subject matter jurisdiction is a question of law. *State ex rel. State Dep't of Highways and Pub. Transp. v. Gonzalez*, 82 S.W.3d 322, 327 (Tex. 2002).

A plea to the jurisdiction can challenge either the pleadings on their face, or can challenge the lack of sufficient jurisdictional facts. *Tex. Dep't of Parks & Wildlife v. Miranda*, 133 S.W.3d 217, 226-27 (Tex. 2004). When "plaintiffs' factual allegations are challenged with supporting evidence necessary to consideration of the plea to the jurisdiction, to avoid dismissal [the] plaintiffs must raise at least a genuine issue of material fact to overcome the challenge to the trial court's subject matter jurisdiction." *Id.* at 221. Accordingly, "in a case in which the jurisdictional challenge implicates the merits of the plaintiffs' cause of action and the plea to the jurisdiction includes evidence, the trial court reviews the relevant evidence to determine if a fact issue exists." *Id.* at 227. Further, "when the facts underlying the merits and subject-matter jurisdiction are intertwined, the State may assert sovereign immunity from suit by a plea to the jurisdiction, even when the trial court must consider evidence necessary to resolve the jurisdictional issues raised." *State v. Lueck*, 290 S.W.3d 876, 880 (Tex. 2009) (internal quotations and citations omitted).

## ARGUMENT

### A. Plaintiffs' claims are barred by sovereign immunity.

As an initial matter, the Court should dismiss Plaintiffs' lawsuit because they have not identified a waiver of sovereign immunity for any of their claims. Texas and its agencies—including the SOS<sup>2</sup>—are protected by sovereign immunity from suit and liability absent a specific statutory waiver of that immunity. *General Servs. Comm'n v. Little–Tex Insulation Co.*, 39 S.W.3d 591, 594 (Tex. 2001). Thus, to proceed, Plaintiffs must either plead and prove a waiver of immunity, or plead and prove that sovereign immunity is inapplicable because the suit is not against the State, but rather against a state official acting ultra vires—that is, without legal authority. *City of El Paso v. Heinrich*, 284 S.W.3d 366, 372 (Tex. 2009).

Plaintiffs' Second Amended Petition is entirely devoid of any allegation or evidence showing that Defendants' sovereign immunity has been waived. Indeed, none of the statutes cited in the pleading abrogate the State's immunity in this scenario. Further, even if Plaintiffs had alleged an ultra vires action—they have not—their claims would still fail because there is no evidence that Defendants' actions are in violation of State law. As is discussed in more detail below, Plaintiffs' claims are barred by sovereign immunity and the Court lacks jurisdiction to adjudicate their claims.

#### 1. None of the cited statutes waive the State's immunity for this type of action.

Plaintiffs bring their suit under the UDJA for purported violations of the Election Code and the PIA. *See* Plfs' Sec. Am. Pet. at ¶¶ 6, 89-107. It is well established that “the UDJA does not establish subject matter jurisdiction. A declaratory judgment action is merely a procedural device

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<sup>2</sup> Defendants retain the State's sovereign immunity because “[i]t is fundamental that a suit against a state official is merely ‘another way of pleading an action against the entity of which [the official] is an agent.’” *Tex. A&M Univ. Sys. v. Koseoglu*, 233 S.W.3d 835, 844 (Tex. 2007) (quoting *Kentucky v. Graham*, 473 U.S. 159, 165 (1985)).

for deciding matters already within a court’s subject matter jurisdiction.” *Beacon Nat’l Ins. Co. v. Montemayor*, 86 S.W.3d at 266 (citing *State v. Morales*, 869 S.W.2d 941, 947 (Tex.1994)). Consequently, in order for this Court to have subject matter jurisdiction, there must exist, outside the UDJA, a cognizable underlying cause of action over which the Court may validly exercise its jurisdiction. *Tex. Parks & Wildlife Dep’t v. Sawyer Trust*, 354 S.W.3d 384, 388 (Tex. 2011) (“[T]here is no general right to sue a state agency for a declaration of rights.”). Here, neither the Election Code, nor the PIA expressly waive the State’s immunity or provide for a private right of action in this scenario.

First, the Election Code does not provide for a private right of action, nor does it expressly waive the State’s immunity in this context. *See, e.g., Berry v. Tex. Democratic Party*, 449 S.W.3d 633, (Tex. App. Austin Oct. 24, 2014, no pet.) (finding that the SOS “retains sovereign immunity from suit as to the [plaintiff’s] claims under the Election Code” that fall outside of the Legislature’s limited waiver of immunity under Chapter 173.<sup>3</sup>)

Second, the Election Code—not the PIA—controls the State’s response to this request, but, even if the PIA was at issue, it does not provide for a waiver of the State’s immunity in this scenario. Rather, while the PIA contains a limited waiver of the State’s immunity for mandamus actions by requestors of public information, *see* Texas Government Code § 552.321, that provision is inapplicable here as this is not a mandamus action and Plaintiffs have not requested the information at issue. At most, Plaintiffs are “Complainants” as defined by section 552.3215 of the PIA. Notably, section 552.3215 provides several statutory prerequisites to suit and limits civil actions for declaratory judgment or injunctive relief against State agencies to those brought by the

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<sup>3</sup> In this Chapter, the Election Code allows for a limited waiver of the State’s immunity for challenges to the amount of State funds approved by the SOS for disbursement. TEX. ELEC. CODE § 173.086(a). This provision is plainly not applicable to this lawsuit and Plaintiffs cannot show a similar waiver of immunity for challenges to the production of public information under the Election Code.

“Travis County district attorney or the attorney general” on behalf of Complainants. TEX. GOV’T CODE § 552.3215(d).

Relevant here, there are no allegations or evidence that Plaintiffs have complied with the statutory prerequisites to suit found in section 552.3215. This failure, by itself, deprives the Court of jurisdiction over Plaintiffs’ claims. *See* TEX. GOV’T. CODE § 311.034; *Prairie View A&M Univ. v. Chatha*, 381 S.W.3d 500, 510-511 (Tex. 2012) (“In a statutory cause of action against a government entity, the failure to adhere to the statute’s mandatory provisions that must be accomplished before filing suit is a jurisdictional bar to suit.”). Further, even if Plaintiffs had timely administratively exhausted their allegations, this suit would still be barred by immunity because section 552.3215 does not waive the State’s immunity to allow a private party to bring a declaratory judgment or injunctive relief action against a State agency. TEX. GOV’T CODE § 552.3215(d) (requiring that the action be brought by the Travis County District Attorney or the Texas Attorney General).

For these reasons, Plaintiffs have not identified a waiver of Defendants’ immunity from suit and the Court, thus, lacks jurisdiction to adjudicate their claims.

**2. Plaintiffs cannot establish an ultra vires claim because the SOS’s actions comply with State law.**

Furthermore, to the extent Plaintiffs intend to allege an ultra vires action, the suit is still barred by sovereign immunity because Plaintiffs cannot establish that Defendants have committed an ultra vires act. To assert a valid claim that fits within the ultra vires exception to sovereign immunity, a plaintiff “must allege, and ultimately prove, that the [State] officer acted without legal authority or failed to perform a purely ministerial act.” *Heinrich*, 284 S.W.3d at 372. This standard is a demanding one because ministerial acts are those where the law prescribes and defines the duties to be performed with such precision and certainty as to leave nothing to the exercise of

discretion. *Anderson v. City of Seven Points*, 806 S.W.2d 791, 792 (Tex. 1991). When a plaintiff “alleges or ultimately can prove only acts within the officer’s legal authority and discretion, the claim seeks ‘to control state action,’ and is barred by sovereign immunity.” *See Machete's Chop Shop, Inc. v. Texas Film Comm'n*, 483 S.W.3d 272, 280 (Tex. App.—Austin 2016, no pet.) (quoting *Heinrich*, 284 S.W.3d at 372).

Here, Plaintiffs fail to state a valid claim as their Second Amended Petition is entirely devoid of any reference to ultra vires acts. Further, any attempt to amend their pleadings to allege an ultra vires claim would be futile as the undisputed evidence conclusively demonstrates that Defendants’ actions have complied with State law.

- a. Section 18.066 of the Election Code controls to production of information from the statewide computerized voter registration list because it the more specific and the later enacted or amended statute.**

As a threshold issue, the Court should determine that Section 18.066 governs the SOS’s response to the Commission’s request for information from the statewide computerized voter registration list. *See* Ex. A-2 (completed Voter Registration Public Information Request Forms). This determination is not only consistent with the Plaintiffs’ own allegations and requests for relief, *see* Plfs’ Sec. Am. Pet. at ¶¶ 13-14, 65-72 (alleging that Election Code’s requirements govern this request); *see also id.* at p. 31 (requesting injunction that Defendants comply with “*all aspects*” of section 18.066 (emphasis added)), but, also follows basic statutory construction rules, which holds that when two statutes conflict the later enacted and more specific statute controls. *See In re Mem'l Hermann Hosp. Sys.*, 464 S.W.3d 686, 716 (Tex. 2015). Here, it cannot be seriously challenged that section 18.066 is more specific as to requests for information from the computerized voter registration list and it was enacted at a later date than the relevant provisions of the PIA.

While the Election Code and the PIA both provide for schemes in which the individuals

can request public information, the statutes conflict in regards to several provisions. For instance, the statutes conflict in regards to request forms,<sup>4</sup> the time to respond,<sup>5</sup> the calculation of fees,<sup>6</sup> and the classes of information exempt from production.<sup>7</sup> To determine which statute governs this request, the Court can use basic rules of statutory construction. Specifically, when two statutes conflict, a court will construe the general provision as controlling only when the manifest intent is that the general provision will prevail and is the also the later-enacted statute. *In re Mem'l Hermann Hosp. Sys.*, 464 S.W.3d at 716.

Since the Commission's request is one for information from the statewide computerized voter registration list, section 18.066 (which deals specifically with this type of request) should control over the more general PIA. *See id.*; TEX. GOV'T CODE § 311.026(b). In addition, the statutory requirements to maintain and produce information from a statewide computerized voter registration list were first enacted in 2003 and later amended in 2007 and 2009. *See Acts 2003*, 78th Leg., ch. 1315, Sec. 9, 10, eff. Jan. 1, 2006 (amended 2007 and 2009). In comparison, the PIA and section 552.101 were enacted in 1993. *See Acts 1993*, 73rd Leg., ch. 268, Sec. 1, eff. Sept. 1, 1993.

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<sup>4</sup> The Election Code requires to SOS to obtain an affidavit from the requestor stating that the requestor will not use the information for commercial purposes. TEX. ELEC. CODE §18.066 (d). On the other hand, the PIA prohibits the State agency from making any inquiry about how the requestor intends to use the information. TEX. GOV'T CODE § 552.222(a).

<sup>5</sup> Section 18.066(a) of the Election Code requires the production within 15 business days of a valid request, whereas section 552.221 of the PIA general requires a production or a certification as to when the documents will be produced within 10 business days.

<sup>6</sup> Section 18.066(e) of the Election Code prescribes that “[t]he secretary may prescribe a schedule of fees for furnishing information under this section”, which “may not exceed the actual expense incurred in reproducing the information requested.” Section 552.261 of the PIA provides that “[t]he charge for providing a copy of public information shall be an amount that reasonably includes all costs related to reproducing the public information, including costs of materials, labor, and overhead.”

<sup>7</sup> For instance, the PIA exempts certain information considered to be confidential by law, including by common law privacy, that the Election Code does not. *Compare Paxton v. City of Dallas*, No. 03-13-00546-CV (Court of Appeals of Texas, Third District, Austin, May 22, 2015) and TEX. GOV'T CODE § 552.101 with TEX. ELEC. CODE §§18.005 (referring to the requirement that the original and supplemental list of registered voters which is generated from the statewide computerized voter registration list must contain the “voter’s name, date of birth, and registration number...”); 18.066; 13.004 (not including “date of birth” as information which is “confidential and does not constitute public information for purposes of Chapter 552, Government Code” as to voter registration applications).

Plaintiffs effectively concede this point in their Second Amended Petition by alleging that the Election Code controls over the PIA in regards to timing, forms, affidavits, and payment. *See, e.g.*, Plfs’ Sec. Am. Pet. at ¶ 13 (“The information sought by the Commission...may be released only under certain circumstances and conditions imposed by Texas’s voting laws. Tex. Elec. Code § 18.066.”); *id.* at ¶¶ 13-14, 65-72 (requestors may only receive information after complying with section 18.066’s requirements). Indeed, Plaintiffs even seek an injunction requiring Defendants to comply with “*all aspects* of Tex. Elec. Code §18.066 *et seq.*” *Id.* at p. 31 (emphasis added). While Plaintiffs are correct to allege that section 18.066’s requirements control over the PIA’s contrary provisions, Plaintiffs cannot at the same time also arbitrarily argue that PIA’s exemptions control over the Election’s exemptions. Rather, because it is undisputed that section 18.066 is the more specific and later-enacted statute, it controls over the PIA in all conflicts, including whether birthdate information is exempt from disclosure.

**b. The SOS required the Commission to submit an affidavit and payment as required by the Election Code.**

Plaintiffs’ allegations are premised on the accusation that Defendants have or will not comply with the Election Code’s requirements. In support, Plaintiffs allege Defendants are violating Texas law by purportedly planning to release public information to the Commission “without adhering to the requirements and protection” of section 18.066. Plfs’ Sec. Am. Pet. at ¶ 91. As a result, Plaintiffs seek an injunction requiring Defendants to comply with “all aspects” of section 18.066. *Id.* at p. 31.

But, Plaintiffs’ conclusory allegations that Defendants are violating State law conflicts with their recent amendments admitting that “the Commission submitted an affidavit” as required by section 18.066. *Id.* at ¶ 22. It also conflicts with the attached evidence undisputedly establishing that the SOS has been continuously complying with section 18.066’s requirements, including

requiring the Commission to submit an affidavit and payment before the production. *See* Ex. A. While Plaintiffs plead that Defendants will violate State law, Texas rules require them to actually produce evidence of their allegations in order to proceed on an ultra vires claim. *See Heinrich*, 284 S.W.3d at 378. Here, there simply is no competent evidence that supports Plaintiffs’ accusations. *See Miranda*, 133 S.W.3d at 226 (if there is no question of fact as to the jurisdictional issue, the trial court must rule on the plea to the jurisdiction as a matter of law). Consequently, to the extent that Plaintiffs allege an ultra vires action, it is barred by sovereign immunity because there is no competent evidence that Defendants have acted outside of their legal authority.

**c. The Election Code does not allow the SOS to exempt birthdate information from its production.**

In addition to the other requirements referred to above, the Election Code and the PIA also conflict regarding what types of information are exempt from production in response to a valid request. Since the Election Code governs the response to the Commission’s request, Plaintiffs must show that the Election Code—not the PIA<sup>8</sup>— exempts birthdate information in order to allege or prove an ultra vires act. Their claims ultimately fail because they cannot make such a showing. To the contrary, the Election Code shows that the Legislature did not intend to allow the SOS the discretion withhold birthdate information from a valid section 18.066 request.

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<sup>8</sup> Contrary to Plaintiffs’ allegations, the PIA does not necessarily require the government entity to withhold birthdate records. Rather, as the Supreme Court and Third Court of Appeals have previously held, whether birthdate information is public information subject to production under the PIA requires weighing the public’s privacy right with the legitimate public concern put forth by the requestor. *See Tex. Comptroller of Pub. Accounts v. AG of Tex.*, 354 S.W.3d 336, 346 (Tex. 2010); *Paxton v. City of Dallas*, No. 03-13-00546-CV, 2015 WL 3394061, 2015 Tex. App. LEXIS 5228 at \* 6 (Tex. App. May 22, 2015, pet. denied). Moreover, even in the event the PIA applies here, common law protections would be superseded by explicit statutory requirements to the contrary. *See Gallagher Headquarters Ranch Dev., Ltd. v. City of San Antonio*, 269 S.W.3d 628, 637 (Tex. App.--San Antonio 2008, pet. granted) (citing *Cash America Int’l Inc. v. Bennett*, 35 S.W.3d 12, 16 (Tex. 2000)) (“When a statute directly conflicts with a common law principle or claim, the statutory provision controls and preempts the common law.”). Should the Court determine that the PIA governs the production, it should notify the federal government to allow it the opportunity to argue whether a legitimate public concern is implicated by this request.

Plaintiffs' likely argument that birthdate information is exempt under the Election Code fails at the outset because the plain language of section 18.066 does not include birthdate information from the express categories of information exempted from production. Under the guiding rules of statutory interpretation "every word of a statute must be presumed to have been used for a purpose" and "every word excluded from a statute must also be presumed to have been excluded for a purpose." *Cameron v. Terrell & Garrett, Inc.*, 618 S.W.2d 535, 540 (Tex. 1981); *accord Tex. Lottery Comm'n v. First State Bank of DeQueen*, 325 S.W.3d 628, 635 (Tex. 2010) ("We presume the Legislature selected language in a statute with care and that every word or phrase was used with a purpose in mind."). In sections 18.066 and 18.005 (as well as in 13.004), the Legislature expressly addressed what categories of information can be withheld pursuant to a valid request and did so in a way that leaves no doubt that birthdate information must be produced.

Chapter 18 of the Election Code holds that the SOS "*shall* furnish information in the statewide computerized voter registration list to any person not later than the 15th day after the date the request is received." *See* TEX. ELEC. CODE §18.066(a) (emphasis added). The Legislature also addressed which categories of information can be withheld from production. *Id.* at § 18.066(b) "Information furnished under this section may not include: a voter's social security number; or the residence address of a voter who is a federal or state judge...or the spouse of a federal judge or state judge" *Id.* These are the only classes of information the Legislature allows the SOS to withhold pursuant to a section 18.066 request.

In addition, section 18.005, which deals with the original and supplemental lists of registered voters generated by the counties, made public by section 18.008, and which derive from the statewide computerized voter registration list, explicitly provides that a voter's date of birth *must* be included and other information *must* be excluded:

(a) Each original and supplemental list of registered voters must: (1) contain the voter's name, *date of birth*, and registration number as provided by the statewide computerized voter registration list; (2) contain the voter's residence address, except as provided by Subsections (b) and (c) or Section 18.0051; (3) be arranged alphabetically by voter name; and (4) contain the notation required by Section 15.111. (b) If the voter's residence has no address, the list must contain a concise description of the location of the voter's residence. (c) The original or supplemental list of registered voters may not contain the residence address of a voter who is a federal judge, a state judge, or the spouse of a federal judge or state judge, if the voter included an affidavit with the voter's registration application under Section 13.0021 or the registrar received an affidavit submitted under Section 15.0215 before the list was prepared. In this subsection, "federal judge" and "state judge" have the meanings assigned by Section 13.0021.

(emphasis added).

The inclusion of one thing in a statute suggests the exclusion of all others. *See Dall. Merch.'s & Concessionaire's Ass'n v. City of Dallas*, 852 S.W.2d 489, 493 n.7 (Tex. 1993). Subsection b of section 18.066 thus shows that the Legislature considered exemptions and provided only for information related to social security number and judges' addresses, and not, as Plaintiffs would have it, for the birthdate information. Moreover, section 18.005(a) makes dates of birth explicitly available and other information explicitly not available. "The fact that the Legislature made" exemptions to public information "expressly available in specific instances suggests that the Legislature did not intend for" it "to be available, by analogy, in this unrelated instance." *Happy Endings Dog Rescue v. Gregory*, 501 S.W.3d 287, 293(Tex. App.—Corpus Christi-Edinburg 2016, pet. denied); *accord Cont'l Cas. Ins. Co. v. Functional Restoration Assocs.*, 19 S.W.3d 393, 401 (Tex. 2000) ("Our conclusion that section 401.021 does not provide a right to judicial review for every APA hearing allowed by the Act is supported by the fact that the Legislature expressly included a right to judicial review for certain APA hearings.").

Furthermore, the remainder of the Election Code provides still more evidence that the Legislature did not intend to exempt birthdate information from section 18.066's requirements.

Most notably, in Chapter 13 the Legislature expressly provided the “following information furnished on a registration application is confidential and does not constitute public information for the purposes of Chapter 552, Government code: (1) a social security number; (2) a Texas driver’s license number; (3) a number of a personal identification card issued by the Department of Public Safety; (4) an indication that an applicant is interested in working as an election judge; or (5) the residence address of the applicant, if the applicant is a federal judge or state judge..., the spouse of a federal or state judge, or an individual to whom Section 552.1175, Government Code, applies.” *See* TEX. ELEC. CODE §13.004(c). Notably, again, the Legislature did not include birthdate information in the categories of information exempted from public information. This omission is even more significant given that in the same section the Legislature expressly exempts “date of birth” information for the types of information that a voter registrar or county official may not post on a website. *Id.* at § 13.004(d). Clearly, the Legislature could have also exempted birthdate information in the previous subsection or in sections 18.005 or 18.066. It did not, and it must be presumed that the Legislature acted for a reason and its choice must be respected and given effect.

For these reasons, Plaintiffs cannot show that the SOS’s production of voter registration information is outside of its legal authority.

**d. The Election Code does not provide Defendants the discretion to condition its production of public information on requirements not found in the statute.**

Finally, Plaintiffs appear to request that the Court issue an injunction placing additional restrictions—not found in the statute—on the release of public information. *See* Plfs’ Sec. Am. Pet. at p. 31 (requesting injunction prohibiting Defendants from releasing public information until submission of...guarantees and assurances as to the use and publication of the Voter List information.”). This request appears to be connected to Plaintiffs’ speculation that the Commission

may release information publicly thereby exposing personal information to third parties not bound by section 18.066's affidavit.

This argument lacks merit for three main reasons. First, there is no competent evidence that the Commission will release any personally identifiable information. Indeed, in a request for this information the Commission's Vice Chair repeatedly and expressly stated: "Let me be clear, the Commission will not release any personally identifiable information from voter registration record to the public."<sup>9</sup> Ex. A-1. Second, Chapter 18 provides a deterrent for any third-party misuse as it provides criminal penalty for any person—requestor or third party—who uses the information for advertising or commercial purposes. *See* TEX. ELEC. CODE §18.067. Third, this is not a unique situation and is a scenario that could occur in conjunction with any public information request whether the requestor is the Commission, MALDEF, or a private citizen. But, since the law in question does not require additional "assurances," the allegation is simply irrelevant to whether Defendants violated the statute.

In any event, regardless of the merit of Plaintiffs' concerns, they admit that these additional assurances are not part of the law either in the Election Code or the PIA. Thus, it does not constitute an act outside of the Defendants' legal authority and cannot form the basis of an ultra vires action. Rather, the request is a classic example of an inappropriate attempt at "controlling state action"

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<sup>9</sup> In its letter requesting voter registration information the Commission stated:

I want to assure you that the Commission will not publicly release any personally identifiable information regarding any individual voter or any group of voters from the voter registration records you submit. Individuals' voter registration records will be kept confidential and secure throughout the duration of the Commission's existence. Once the Commission's analysis is complete, the Commission will dispose of the data as permitted by federal law. The only information that will be made public are statistical conclusions drawn from the data, other general observations that may be drawn from the data, and any correspondence that you may send to the Commission in response to the narrative questions enumerated in the June 28 letter. Let me be clear, the Commission will not release any personally identifiable information from voter registration records to be public.

Ex. A-1.

that should not be countenanced. *See Machete's Chop Shop, Inc.*, 483 S.W.3d at 280 (when a plaintiff alleges or ultimately can prove only acts within the officer's legal authority and discretion, the claim seeks to control state action, and is barred by sovereign immunity.).

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For these reasons, Plaintiffs cannot show that the Defendants have taken or will take an action outside of their legal authority and, thus, they have not stated a valid ultra vires claim. Accordingly, their claims are barred by sovereign immunity.

**B. Alternatively, to the extent Plaintiffs allege a violation of the PIA, their claims and request for relief are barred by the redundant remedies doctrine.**

In addition, to the extent Plaintiffs allege a violation of the PIA through their UDJA claims, their claims are also barred by the redundant remedies doctrine. "Under the redundant remedies doctrine, courts will not entertain an action brought under the UDJA when the same claim could be pursued through different channels." *Patel v. Tex. Dep't of Licensing & Regulation*, 469 S.W.3d 69, 79 (Tex. 2015). Thus, when a plaintiff invokes a statutory means of attacking an agency order, the trial court lacks jurisdiction over an additional claim under the UDJA that would merely determine the same issues and provide substantively the same relief as the statutory remedy. *Texas Dep't of State Health Serv. v. Balquinta*, 429 S.W.3d 726, 738 (Tex. App.—Austin 2014, pet. dismiss'd).

As discussed above, the section 552.3215 of the PIA provides a statutory scheme and remedy for Complainants to obtain declaratory and injunctive relief for alleged violations of the Act. Through this section, the Legislature provided for a limited waiver of the State's immunity from suit to allow the Travis County District Attorney or the Texas Attorney General to sue State agencies on behalf of a Complainant in a civil action for declaratory and injunctive relief. TEX. GOV'T CODE § 552.3215. The PIA also provides for the recovery of attorney's fees and costs for

actions brought under section 552.3215. TEX. GOV'T CODE § 552.323. In total, this is essentially the same relief that Plaintiffs request through their UDJA claims in this suit. Therefore, Plaintiffs “already ha[ve] a statutory channel by which to obtain the relief that [they] seek[], and its redundant ultra vires brought under the UDJA are not justiciable.” *McLane Co., Inc. v. Tex. Alcoholic Beverage Comm'n*, 514 S.W.3d 871, 877 (Tex. App.—Austin 2017, pet. denied).<sup>10</sup> Accordingly, the Court lacks jurisdiction to adjudicate any claims premised on a violation of the PIA.

### CONCLUSION AND PRAYER

For all of the foregoing reasons, this Court should grant Defendants’ Plea to the Jurisdiction, thereby dismissing all of Plaintiffs’ claims with prejudice.

Date: September 26, 2017

Respectfully submitted.

KEN PAXTON  
Attorney General of Texas

JEFFREY C. MATEER  
First Assistant Attorney General

BRANTLEY STARR  
Deputy First Assistant Attorney General

JAMES E. DAVIS  
Deputy Attorney General for Civil Litigation

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<sup>10</sup> Likewise, Plaintiffs are not allowed to recover attorney’s fees or costs under the UDJA when the PIA already provides it with a channel for challenging the production. As the Third Court of Appeals explained in *Giggleman*:

[I]f there is an underlying justiciable controversy regarding construction of statutes that could provide a jurisdictional basis for the UDJA claims Giggleman purports to assert, it must exist solely by virtue of the waiver of sovereign immunity contained in PIA section 552.321. Consequently, any such UDJA claims would, by definition, be merely incidental to the relief Giggleman could obtain through his PIA mandamus claim—and could not be a basis for UDJA attorney’s fees.

*Texas State Bd. of Veterinary Med. Exam’rs v. Giggleman*, 408 S.W.3d 696, 708 (Tex. App.—Austin 2013, no pet.) (citations omitted); *Elliott v. Rockwood Vill. Partners, Ltd.*, No. 03-12-00298-CV, 2012 WL 6554826, at \*7 (Tex. App.—Austin Dec. 12, 2012, no pet.) (mem. op.) (“A party may not plead for declaratory relief simply to pave the way to recover attorneys’ fees.”).

10

ANGELA V. COLMENERO  
Chief, General Litigation Division

/s/ Esteban S.M. Soto

ESTEBAN S.M. SOTO

State Bar No. 24052284

Assistant Attorneys General

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[esteban.soto@oag.texas.gov](mailto:esteban.soto@oag.texas.gov)

*ATTORNEYS FOR DEFENDANTS*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing documents has been served on this the 26 day of September, 2017 on the following:

Charles W. McGarry  
Texas Bar No. 13610650  
701 Commerce Street, Suite 400  
Dallas, Texas 75202  
(214) 748-0800  
(214) 748-9449 fax  
[cmcgarry@ix.netcom.com](mailto:cmcgarry@ix.netcom.com)

Myrna Pérez, Esq.  
Douglas Keith, Esq.  
**Brennan Center for Justice**  
120 Broadway, Suite 1750  
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*(Pending admission pro hac vice)*  
**ATTORNEYS FOR PLAINTIFFS**

/s/ Esteban Soto  
ESTEBAN SOTO

LEAGUE OF WOMEN VOTERS OF  
TEXAS, TEXAS STATE CONFERENCE  
OF THE NATIONAL ASSOCIATION  
FOR THE ADVANCEMENT OF  
COLORED PEOPLE (NAACP) and  
RUTHANN GEER,  
*Plaintiff*

IN THE DISTRICT COURT OF

TRAVIS COUNTY, TEXAS

v.

ROLANDO PABLOS, Secretary of State  
for the State of Texas, and KEITH  
INGRAM, Director, Texas Elections  
Division of the Secretary of State,  
*Defendant.*

98<sup>TH</sup> JUDICIAL DISTRICT

**AFFIDAVIT OF BRIAN KEITH INGRAM**

STATE OF TEXAS                   §  
  §  
COUNTY OF TRAVIS           §

1. My name is Brian Keith Ingram. I am over the age of 18 and competent in all respects to make this Affidavit. The testimony provided in this Affidavit is based upon my personal knowledge and experience.

2. I am the Director of Elections for the Office of the Texas Secretary of State. The Secretary of State is the chief election officer of Texas. *See* TEX. ELEC. CODE § 31.001. As the Director of Elections, I supervise the Secretary of State’s Elections Division. The Elections Division’s primary responsibility is ensuring that the Secretary of State discharges all of his duties under the Texas Election Code as the Chief Election Officer for Texas.

3. On or about June 28, 2017, the Office of the Texas Secretary of State received a request from the Presidential Advisory Commission on Election Integrity (the “Commission”) for publicly available voter registration records. Our office considers this a request for information from the statewide computerized voter registration system pursuant to section 18.066 of the Texas Election Code. In order to receive information pursuant to section 18.066, a requestor must comply with several statutory requirements including that he or she submit an affidavit to the Secretary stating that the person will not use the information obtained in connection with advertising or promoting commercial products or services. *See* TEX. ELEC. CODE § 18.066(d). On July 10, 2017, prior to receiving the required affidavit, the Commission requested that our office delay submitting any records until the U.S. District Court for the District of Columbia ruled on a pending motion that sought to prevent the Commission from receiving records. Subsequently, on July 26, 2017, our office received another correspondence from the Commission re-asserting its request for voter registration records. True and correct copies of the June 28, July 10, and July 26 correspondence from the Commission are attached hereto as Exhibit A-1.

4. After receiving the Commission’s request for information, our office notified it of section 18.066’s requirements, including that it had to fill out an affidavit and pay for the requested information. *See* TEX. ELEC. CODE § 18.066(d)-(e). Our office received a Voter Registration Public Information Request Form from the Commission on September 7, 2017. Subsequently, on September 13, 2017, our office received a re-executed request form that was amended to request certain voter history from 2006 onward. On September 19, 2017, our office processed full payment in the amount of \$3,437.30 for the file. Our office has not, however, yet produced a copy of the responsive information, but the fifteenth business day from the date of receipt of the re-executed request form is October 4, 2017. True and correct copies of the Commission’s Voter Registration

Public Information Request Forms, as well as a redacted copy of the payment receipt, are attached hereto as Exhibit A-2.

5. The Office of the Secretary of State has produced information—including birthdate information—pursuant to section 18.066 in response to valid requests for voter registration information from a variety of individuals and organizations, including both Democratic and Republican state and federal legislators and people associated with political campaigns, university and research organization, such as Catalist and Harvard University, non-profit organizations, such as the Mexican American Legal Defense and Educational Fund (“MALDEF”) and the National Association of Latino Election Officials (“NALEO”), and federal courts (both under section 18.066 and separate federal statutes and court orders). The Office of the Secretary of State intends to comply with section 18.066’s requirements in responding to the Commission’s request just as it has in the past with similar requests from individuals and organizations from across the political spectrum. A true and correct copy of a document detailing prior requests for voter registration information under Section 18.066 of the Texas Election Code is attached hereto as Exhibit A-3.

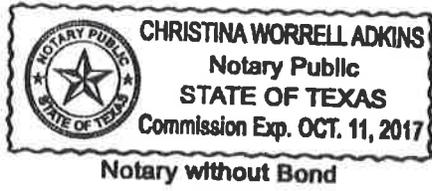
Executed this 26th day of September, 2017.



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BRIAN KEITH INGRAM  
Director of Elections  
Office of the Texas Secretary of State

SUBSCRIBED AND SWORN TO before me on this the 24 day of September, 2017, to  
which witness my hand and seal of office.



  
NOTARY PUBLIC, STATE OF TEXAS



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## Presidential Advisory Commission on Election Integrity

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June 28, 2017

The Honorable Rolando Pablos  
Secretary of State  
1100 Congress Ave.  
Austin, TX 78701

Dear Secretary Pablos,

I serve as the Vice Chair for the Presidential Advisory Commission on Election Integrity (“Commission”), which was formed pursuant to Executive Order 13799 of May 11, 2017. The Commission is charged with studying the registration and voting processes used in federal elections and submitting a report to the President of the United States that identifies laws, rules, policies, activities, strategies, and practices that enhance or undermine the American people’s confidence in the integrity of federal elections processes.

As the Commission begins its work, I invite you to contribute your views and recommendations throughout this process. In particular:

1. What changes, if any, to federal election laws would you recommend to enhance the integrity of federal elections?
2. How can the Commission support state and local election administrators with regard to information technology security and vulnerabilities?
3. What laws, policies, or other issues hinder your ability to ensure the integrity of elections you administer?
4. What evidence or information do you have regarding instances of voter fraud or registration fraud in your state?
5. What convictions for election-related crimes have occurred in your state since the November 2000 federal election?
6. What recommendations do you have for preventing voter intimidation or disenfranchisement?
7. What other issues do you believe the Commission should consider?

In addition, in order for the Commission to fully analyze vulnerabilities and issues related to voter registration and voting, I am requesting that you provide to the Commission the publicly-available voter roll data for Texas, including, if publicly available under the laws of your state, the full first and last names of all registrants, middle names or initials if available, addresses, dates of birth, political party (if recorded in your state), last four digits of social security number

if available, voter history (elections voted in) from 2006 onward, active/inactive status, cancelled status, information regarding any felony convictions, information regarding voter registration in another state, information regarding military status, and overseas citizen information.

You may submit your responses electronically to [ElectionIntegrityStaff@ovp.eop.gov](mailto:ElectionIntegrityStaff@ovp.eop.gov) or by utilizing the Safe Access File Exchange (“SAFE”), which is a secure FTP site the federal government uses for transferring large data files. You can access the SAFE site at <https://safe.amrdec.army.mil/safe/Welcome.aspx>. We would appreciate a response by July 14, 2017. Please be aware that any documents that are submitted to the full Commission will also be made available to the public. If you have any questions, please contact Commission staff at the same email address.

On behalf of my fellow commissioners, I also want to acknowledge your important leadership role in administering the elections within your state and the importance of state-level authority in our federalist system. It is crucial for the Commission to consider your input as it collects data and identifies areas of opportunity to increase the integrity of our election systems.

I look forward to hearing from you and working with you in the months ahead.

Sincerely,

A handwritten signature in black ink that reads "Kris Kobach". The signature is written in a cursive, slightly slanted style.

Kris W. Kobach  
Vice Chair  
Presidential Advisory Commission on Election Integrity

**From:** FN-OVP-Election Integrity Staff [mailto:[ElectionIntegrityStaff@ovp.eop.gov](mailto:ElectionIntegrityStaff@ovp.eop.gov)]

**Sent:** Monday, July 10, 2017 8:40 AM

**Subject:** Request to Hold on Submitting Any Data Until Judge Rules on TRO

Dear Election Official,

As you may know, the Electronic Privacy Information Center filed a complaint seeking a Temporary Restraining Order (“TRO”) in connection with the June 28, 2017 letter sent by Vice Chair Kris Kobach requesting publicly-available voter data. See *Electronic Privacy Information Center v. Presidential Advisory Commission on Election Integrity* filed in the U.S. District Court for the District of Columbia. Until the Judge rules on the TRO, we request that you hold on submitting any data. We will follow up with you with further instructions once the Judge issues her ruling.

Andrew Kossack  
Designated Federal Officer  
Presidential Advisory Commission on Election Integrity  
[ElectionIntegrityStaff@ovp.eop.gov](mailto:ElectionIntegrityStaff@ovp.eop.gov)



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## Presidential Advisory Commission on Election Integrity

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July 26, 2017

Office of the Secretary of State of Texas  
The Honorable Rolando Pablos, Secretary of State  
1100 Congress, Room 1E.8  
Austin, TX 78701

Dear Secretary Pablos,

In my capacity as Vice Chair of the Presidential Advisory Commission on Election Integrity, I wrote to you on June 28, 2017, to request publicly available voter registration records. On July 10, 2017, the Commission staff requested that you delay submitting any records until the U.S. District Court for the District of Columbia ruled on a motion from the Electronic Privacy Information Center that sought to prevent the Commission from receiving the records. On July 24, 2017, the court denied that motion. In light of that decision in the Commission's favor, I write to renew the June 28 request, as well as to answer questions some States raised about the request's scope and the Commission's intent regarding its use of the registration records. I appreciate the cooperation of chief election officials from more than 30 States who have already responded to the June 28 request and either agreed to provide these publicly available records, or are currently evaluating what specific records they may provide in accordance with their State laws.

Like you, I serve as the chief election official of my State. And like you, ensuring the privacy and security of any non-public voter information is a high priority. My June 28 letter only requested information that is already available to the public under the laws of your State, which is information that States regularly provide to political candidates, journalists, and other interested members of the public. As you know, federal law requires the States to maintain certain voter registration information and make it available to the public pursuant to the National Voter Registration Act (NVRA) and the Help America Vote Act (HAVA). The Commission recognizes that State laws differ regarding what specific voter registration information is publicly available.

I want to assure you that the Commission will not publicly release any personally identifiable information regarding any individual voter or any group of voters from the voter registration records you submit. Individuals' voter registration records will be kept confidential and secure throughout the duration of the Commission's existence. Once the Commission's analysis is

complete, the Commission will dispose of the data as permitted by federal law. The only information that will be made public are statistical conclusions drawn from the data, other general observations that may be drawn from the data, and any correspondence that you may send to the Commission in response to the narrative questions enumerated in the June 28 letter. Let me be clear, the Commission will not release any personally identifiable information from voter registration records to the public.

In addition, to address issues raised in recent litigation regarding the data transfer portal, the Commission is offering a new tool for you to transmit data directly to the White House computer system. To securely submit your State's data, please have a member of your staff contact Ron Williams on the Commission's staff at [ElectionIntegrityStaff@ovp.eop.gov](mailto:ElectionIntegrityStaff@ovp.eop.gov) and provide his or her contact information. Commission staff will then reach out to your point of contact to provide detailed instructions for submitting the data securely.

The Commission will approach all of its work without preconceived conclusions or prejudgments. The Members of this bipartisan Commission are interested in gathering facts and going where those facts lead. We take seriously the Commission's mission pursuant to Executive Order 13799 to identify those laws, rules, policies, activities, strategies, and practices that either enhance or undermine the integrity of elections processes. I look forward to working with you in the months ahead to advance those objectives.

Sincerely,

A handwritten signature in black ink, appearing to read "Kris Kobach". The signature is written in a cursive, slightly slanted style.

Kris W. Kobach  
Vice Chair  
Presidential Advisory Commission on Election Integrity

# The State of Texas



Elections Division  
P.O. Box 12060  
Austin, Texas 78711-2060  
www.sos.state.tx.us

Phone: 512-463-5650  
Fax: 512-475-2811  
Dial 7-1-1 For Relay Services  
(800) 252-VOTE (8683)

Secretary of State

**For Internal Use Only**  
Receipt date: \_\_\_/\_\_\_/\_\_\_  
PIR-Log number: \_\_\_\_\_

## VOTER REGISTRATION PUBLIC INFORMATION REQUEST FORM

**Media must be completed:**

**Media**

- CD-ROM  
 FTP - Provide FTP information:

FTP site: \_\_\_\_\_  
Login: \_\_\_\_\_  
Password: \_\_\_\_\_

**Format being provided**

Voter registration list (individual records) in zipped fixed width text file(s). See the attached record layout.

**Requestor name:**

Ron Williams

**(required)**

**Flagging Options ONLY**

- Hispanic surname flag notation

**Voters may be extracted by**

*Please checkmark all that apply to the request:*

- Include Active Voters  
 Include Suspense Voters  
 Include Cancelled Voters

**I would like my data reduced to the following**

*Please checkmark all that apply to the request:*

- Only voters with Texas mailing address  
 Only voters who are effective to vote between \_\_\_\_\_ and \_\_\_\_\_ dates  
 Only voters between the age \_\_\_\_\_ and \_\_\_\_\_  
 Hispanic Surnames only  
 Males only  
 Females only  
 Voters who Voted in the following Elections:  
 Entire State  Counties listed below only

**Elections and Years:**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

A "suspense voter" is a voter known to have an incorrect or outdated address.

The county has sent the voter a form to obtain a new current address, but no response has been received. The voter is however, considered to be an active voter for voting purposes.

If the entire state is requested, mark the space provided. If a district or county is requested, list the district number or county (write "All" by the county name to indicate all precincts). Otherwise, for partial district, county or other requests, please list the county names and applicable precinct numbers.

**COUNTY NAME(S) or DISTRICT NUMBER(S)**      Check if entire State

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

NOTE: For requests in addition to the options provided on this form, please email [elections@sos.texas.gov](mailto:elections@sos.texas.gov), as a data manipulation estimate may need to be provided for you.

<b><u>For Internal Use Only</u></b>		
First Reviewer: _____	Date reviewed: ___/___/___	EFM: _____
Second Reviewer: _____	Date reviewed: ___/___/___	Date processed: ___/___/___
Completion date: ___/___/___		

## PUBLIC INFORMATION REQUEST FORM DETAILS AND INSTRUCTIONS

### Send Order to:

Ron Williams, Policy Advisor

Presidential Advisory Commission on Election Integrity

1650 Pennsylvania Ave., NW, EEOB-Rm. 268, Washington, DC 20504

Telephone (202) 881-7807

### Send Statement to:

Kris L. Palmer, Program Analyst

General Services Administration

1800 F Street, NW, Washington, D.C. 20405

Telephone (202) 501-0525

Below are the procedures for filling out the attached Public Information Request form. Failure to adequately complete the form may cause incorrect information or could delay the processing of your order.

1. Media Selection: CD-ROM or FTP. If selecting an FTP please provide FTP site, login and password information.
2. Format: Voter registration list (individual records) in zipped fixed width text file(s). See the attached record layout.
3. Extracts & Data Reduction- Options may be selected to select a limited group of voters. Additional extract requests may result in data manipulation, which would result in additional charges. Section 552.231 of the Texas Government Code requires that agencies send a written statement about the cost of potentially manipulating data to any requestor. Should it be determined that your request will require data manipulation, then a statement of the estimated cost of providing the information in the requested form will be supplied to you within the timeframe outlined in section 552.231.
4. In the area for county name(s) or District Number(s), please note the following: **If the entire state is requested**, mark the space provided. **If a district or county is requested**, list the district number or county (write "All" by the county name to indicate all precincts). Otherwise, for partial district, county or other requests, please list the county names and applicable precinct numbers.
5. The attached affidavit must be signed before a notary public. A \$75.00 deposit must accompany each request. If the request is from a Member of the House or Senate, the Member must submit the request through the appropriate business office for approval of funds **before** submitting it to this office, unless the request is being paid for out of personal funds. CD-ROM will not be released and/or files will not be uploaded to the FTP until full payment is received. A complete address (No P. O. Box) must be provided along with a telephone number. The Secretary of State will furnish information not later than the 15<sup>th</sup> day after the date the request is received. (Texas Election Code, Section 18.066).

Please retain a copy of this form for your records. Please include a \$75.00 deposit fee with your request, made payable to the Secretary of State's Office. The Secretary of State will furnish the information not later than the 15th day after the date the request is received. Your order will not be released until full payment is received. The attached affidavit must be signed before a notary public and accompany all requests.

If you have any questions, please contact Elections Division at (512) 463-5650 or toll free at 1-800-252-VOTE (8683).

Affidavit

~~THE STATE OF TEXAS~~ District of Columbia: SS

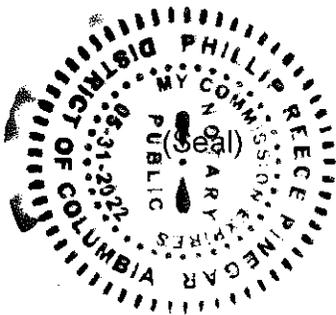
~~COUNTY OF~~ \_\_\_\_\_

Before me, the undersigned authority, on this day personally appeared  
Non Williams, who being duly sworn, deposes and says:

I do solemnly swear that the information obtained from the copy of the State Master Voter File will not be used to advertise or promote commercial products or services.

[Signature]  
Signature

Sworn to and Subscribe before me, this the 7 day of Sept., 2017.



[Signature]  
Notary Public in and for the State of Texas

Phillip R. Pinegar  
Printed Name of Notary

My commission Expires: 5-31-2022

**PLEASE BE ADVISED**

**§ 18.067. Unlawful Use of Master File Information**

(a) A person commits an offense if the person uses information in connection with advertising or promoting commercial products or services that the person knows was obtained under Section 18.066.

(b) An offense under this section is a Class A misdemeanor.

Acts 1985, 69th Leg., ch. 211, § 1, eff. Jan. 1, 1986.

Amended by Acts 1997, 75th Leg., ch. 864, § 13, eff. Sept. 1, 1997.

# The State of Texas



Elections Division  
P.O. Box 12060  
Austin, Texas 78711-2060  
www.sos.state.tx.us

Phone: 512-463-5650  
Fax: 512-475-2811  
Dial 7-1-1 For Relay Services  
(800) 252-VOTE (8683)

Secretary of State

**For Internal Use Only**  
Receipt date: \_\_\_/\_\_\_/\_\_\_  
PIR-Log number: \_\_\_\_\_

## VOTER REGISTRATION PUBLIC INFORMATION REQUEST FORM

**Media must be completed:**

### Media

- CD-ROM  
 FTP - Provide FTP information:

FTP site: \_\_\_\_\_  
Login: \_\_\_\_\_  
Password: \_\_\_\_\_

### Format being provided

Voter registration list (individual records)  
in zipped fixed width text file(s). See the  
attached record layout.

### Requestor name:

Ron Williams

(required)

### Flagging Options ONLY

- Hispanic surname flag notation

### Voters may be extracted by

*Please checkmark all that apply to the request:*

- Include Active Voters  
 Include Suspense Voters  
 Include Cancelled Voters

### I would like my data reduced to the following

*Please checkmark all that apply to the request:*

- Only voters with Texas mailing address  
 Only voters who are effective to vote between  
\_\_\_\_\_ and \_\_\_\_\_ dates  
 Only voters between the age \_\_\_\_ and \_\_\_\_  
 Hispanic Surnames only  
 Males only  
 Females only  
 Voters who Voted in the following Elections:

- Entire State  Counties listed below only

### Elections and Years:

General Election (11/07/2006; 11/04/2008; 11/02/2010; 11/06/2012; 11/04/2014; 11/08/2016)

A "suspense voter" is a voter known to have an incorrect or outdated address.

The county has sent the voter a form to obtain a new current address, but no response has been received. The voter is however, considered to be an active voter for voting purposes.

If the **entire state** is requested, mark the space provided. If a **district or county** is requested, list the district number or county (write "All" by the county name to indicate all precincts). Otherwise, for partial district, county or other requests, please list the county names and applicable precinct numbers.

**COUNTY NAME(S) or DISTRICT NUMBER(S)**      Check if entire State

NOTE: For requests in addition to the options provided on this form, please email [elections@sos.texas.gov](mailto:elections@sos.texas.gov), as a data manipulation estimate may need to be provided for you.

<i>For Internal Use Only</i>		
First Reviewer: _____	Date reviewed: ___/___/___	EFM: _____
Second Reviewer: _____	Date reviewed: ___/___/___	Date processed: ___/___/___
Completion date: ___/___/___		

11.30.16

Rec. 139

## PUBLIC INFORMATION REQUEST FORM DETAILS AND INSTRUCTIONS

### Send Order to:

Ron Williams, Policy Advisor

Presidential Advisory Commission on Election Integrity

1650 Pennsylvania Ave., NW, EEOB-Rm. 268, Washington, DC 20504

Telephone (202) 881-7807

### Send Statement to:

Kris L. Palmer, Program Analyst

General Services Administration

1800 F Street, N.W., Washington, DC 20405

Telephone (202) 501-0525

Below are the procedures for filling out the attached Public Information Request form. Failure to adequately complete the form may cause incorrect information or could delay the processing of your order.

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5. The attached affidavit must be signed before a notary public. A \$75.00 deposit must accompany each request. If the request is from a Member of the House or Senate, the Member must submit the request through the appropriate business office for approval of funds **before** submitting it to this office, unless the request is being paid for out of personal funds. CD-ROM will not be released and/or files will not be uploaded to the FTP until full payment is received. A complete address (No P. O. Box) must be provided along with a telephone number. The Secretary of State will furnish information not later than the 15<sup>th</sup> day after the date the request is received. (Texas Election Code, Section 18.066).

Please retain a copy of this form for your records. Please include a \$75.00 deposit fee with your request, made payable to the Secretary of State's Office. The Secretary of State will furnish the information not later than the 15th day after the date the request is received. Your order will not be released until full payment is received. The attached affidavit must be signed before a notary public and accompany all requests.

If you have any questions, please contact Elections Division at (512) 463-5650 or toll free at 1-800-252-VOTE (8683).

Affidavit

~~THE STATE OF TEXAS~~ District of Columbia: SS

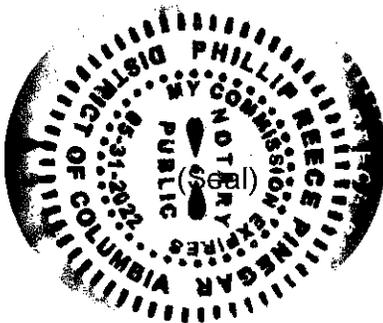
~~COUNTY OF~~ \_\_\_\_\_

Before me, the undersigned authority, on this day personally appeared  
Ron Williams \_\_\_\_\_, who being duly sworn, deposes and says:

I do solemnly swear that the information obtained from the copy of the State Master  
Voter File will not be used to advertise or promote commercial products or services.

  
\_\_\_\_\_  
Signature

Sworn to and Subscribe before me, this the 13 day of Sept., 2017.



  
\_\_\_\_\_  
Notary Public in and for the State of Texas  
District of Columbia

Phillip R. Pinegar  
\_\_\_\_\_  
Printed Name of Notary

My commission Expires: 5-31-2022

**PLEASE BE ADVISED**

**§ 18.067. Unlawful Use of Master File Information**

(a) A person commits an offense if the person uses information in connection with advertising or promoting commercial products or services that the person knows was obtained under Section 18.066.

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Acts 1985, 69th Leg., ch. 211, § 1, eff. Jan. 1, 1986.

Amended by Acts 1997, 75th Leg., ch. 864, § 13, eff. Sept. 1, 1997.

Financial Division  
P.O.Box 12887  
Austin, Texas 78711-2887



Rolando B. Pablos  
Secretary of State

Office of the Secretary of State  
**Packing Slip**

**September 19, 2017**

Page 1 of 1

Kris L Palmer  
1800 F Street NW  
Washington DC 20405

**Batch Number:** 76226842

**Batch Date:** 09-19-2017

**Client ID:**  
**Return Method:** Mail

<b>Document Number</b>	<b>Document Detail</b>	<b>Fee</b>
762268420002	Public Information - Statewide VH/VD, active/suspense/cancelled, Hispanic surname flag, voted in Gen Elec's '06, '08, '10, '12, '14, '16	\$3,437.30
<b>Total Document Fees</b>		<b>\$3,437.30</b>

<b>Payment Type</b>	<b>Payment Status</b>	<b>Payment Reference</b>	<b>Amount</b>
Credit Card	Accepted		\$3,437.30
<b>Total Payments Received</b>			<b>\$3,437.30</b>

<b>Total Amount Charged to Client Account</b>	\$0.00
<b>Total Amount Credited to Client Account</b>	\$0.00

*Note:* This is not a bill. Please do not send any payments until the monthly statement is received.  
Any amount credited to Client Account may be refunded upon request.  
Refunds (if applicable) will be processed upon Request.  
Acknowledgement of Filing Document(s) (if present) is attached.

User ID: AGROSSMAN

Come visit us on the Internet @ <http://www.sos.state.tx.us/>

PI NUMBER	DATE	DUE	Requestor	TEAM CHARGE	TOTAL CHARGE	CD Charge	STATUS	DESCRIPTION	COMMENTS
20140300	1/6/15		John Andersen	See 20140302			complete	VH-Voters who voted in the Nov 5th 2013 Election, active and suspense, Statewide, Hispanic Surname Flagged.	
20140302	1/6/15		John Andersen	\$ 1,545.17	\$ 1,545.17	\$0.00	complete	VD-List of Registered Voters in active and suspense status. Statewide,TX. Hispanic Surname Flagged.	
20140303	1/6/15		Caroline Gorman	\$ 1,175.01	\$ 1,175.01	\$0.00	complete	VD- List of Registered Voters, Statewide-TX, active & suspense status.	
201403011	1/6/15		John Andersen	See 20140302			complete	VH-Voters who voted in the General 2014 Nov 4 Election, active and suspense, STATEWIDE, Hispanic Surname Flagged.	
20140304	1/7/15		Rep. Lamar Smith	\$ 95.32	\$ 95.32	\$0.00	complete	VD-List of Registered Voters with only active status, with Texas mailing address, who have an effective date of registration between 12/01/14-12/31/14. For several counties and various precincts.	
20140305	1/8/15		Benjamin McPhaul	see 20140312	see 20140312		complete	Dec 2014 Special Election SD 18, Hispanic Surname Flagged. Various Counties.	
20140312	1/8/15		Benjamin McPhaul	\$ 121.79	\$ 121.79	\$0.00	complete	September 2014 Special Election SD 28, Hispanic Surname Flagged. Various Counties.	
20140306	1/9/15		Carolyn Lehmann	\$ 112.48	\$ 112.48	\$0.00	complete	VH- Voters who voted in the Dec 2014 Spec Election SD 18, Hispanic Surname Flagged, NEED COUNTIES AND PRECINCTS. Active & Suspense status.	
20140309	1/9/15		Rep. Toni Rose	\$ 127.53	\$ 127.53	\$0.00	complete	VD-List of Registered Voters with Texas Mailing Address in active status only. Dallas County, several precincts.	
20140310	1/12/15		Justin Gargiulo	see PIR#20140316	see PIR#20140316	\$0.00	complete	VD- List of Registered Voters in active and suspense status that have EDR 7/10/14-12/29/14. Hispanic Surname Flagged. Statewide.	
20140311	1/12/15		Matthew Packer/Trent Matherson	\$ 3,571.05	\$ 3,571.05	\$0.00	complete	VH-List of Registered Voters, who voted in all elections from 2000 to 2014. Active, suspense, cancelled status. Hispanic surname flagged. Statewide.	WAITING ON CHECK, CREDIT CART CANNOT BE USED, check has been received. Order is complete.
20140316	1/12/15		Justin Gargiulo	\$ 660.24	\$ 660.24	\$0.00	Complete	VH- List of voters who voted in the Nov 4th General Election 2014, Statewide, in active and suspense status. Hispanic Surname Flagged.	
20140313	1/14/15		Rep. Angie Chen Button	\$ 133.25	\$ 133.25	\$0.00	complete	VD- List of Voters with Texas Mailing address, only active status, Dallas County, several precincts.	
20140314	1/14/15		Rep. Ted Poe	\$ 94.95	\$ 94.95	\$0.00	complete	VD- List of Voters with EDR December 2014, active and suspense status, HARRIS county, several precincts.	
20140315	1/14/15		Ekaterina Ksenjek	\$ 1,174.98	\$ 1,174.98	\$0.00	complete	VD-List of Registered Voters(active and suspense) registered in Texas. Statewide. Does not include voting history.	
20140317	1/22/15		Ekaterina Ksenjek	\$ 815.60	\$ 815.60	\$0.00	complete	VH- Active and suspense voters, statewide,who voted in all 2014 Elections(Primary, Runoff, Special & General).	
20140318	1/23/15		Mr. Hood	\$ 623.38	\$ 623.38	\$0.00	complete	VH- Voters who voted in the 2014 Nov 4th General Election, in active and suspense status, Hispanic Surname Flagged, Statewide.	
20140319	1/26/15		Dan Buttrey - c/o Danielle	see 20140320	see 20140320	see 20140320	complete	VD- List of Registered Voters, Statewide-TX, active & suspense status.	
20140320	1/26/15		Dan Buttrey - c/o Danielle	\$ 1,470.07	\$ 1,481.07	\$11.00	complete	VH- Voters who voted in the Nov 4 2014 General Election. Statewide. Active & Suspense.	
20140321	1/29/15		Jennifer Flaherty	\$ 433.80	\$ 433.80	\$0.00	complete	VH-Voters who voted in the General Elections of 2008, 2010, 2012 & 2014. Active and Suspense Voters. 3 COUNTIES: Bexar, Comal and Medina.	
20140322	1/29/15		Gavin DeSchutter	see 20140325	see 20140325	see 20140326	complete	VH- Nov 4th General Election 2014, active and suspense. Statewide.	
20140325	1/29/15		Gavin DeSchutter	\$ 1,471.97	\$ 1,471.97	\$0.00	complete	VD-Statewide File,active and suspense.	
20140323	1/30/15		Jordan	\$ 112.74	\$ 123.74	\$11.00	ONLY ESTIMATE	VH- Voters who voted, suspense & active status, Special Election of Dec 6, 2014. SD 18. All counties involved/Statewide	
20140324	2/3/15		Rep. Lamar Smith	\$ 94.73	\$ 94.73	\$11.00	complete	VD-List of Registered Voters with only active status, with Texas mailing address, who have an effective date of registration between 01/01/15 and 01/31/15. For several counties and various precincts.	
20140327	2/5/15		Rep. Ted Poe	\$ 94.74	\$ 94.74	\$0.00	complete	VD- Voters with Effective Date of Registration January 2015, active & suspense. Harris County, several precincts.	
20140328	2/6/15		Matthew Packer/Trent Matherson				complete	VD- List of Registered Voters, active and suspense status, Hispanic Surname flagged, Statewide voter file.	
20140329	2/10/15		Jennifer Flaherty				complete		
20140331	2/11/15		Andre Joseph	\$ 119.51	\$ 119.51	\$0.00	complete	VH- Voters who voted in the March 4 2014, Primary Democratic Election, active & suspense status, Harris County - all precincts.	
20140332	2/12/15		Debra Curti - Estimate				ONLY ESTIMATE		
20140333	2/17/15		Jordan Ring	\$ 112.74	\$ 123.74	\$11.00	complete	VH-voters who voted in the Special Election Senate District 18, 2014. active and suspense status.	
20140334	2/17/15		Digital Recognition Network/John Nethery	\$ 1,113.89	\$ 1,113.89	\$0.00	complete	VD- List of Registered Voters in TX, only in active status. Statewide.	
20140335	2/17/15		Adam Schaeffer/Chris Turner	\$ 623.11	\$ 634.11	\$11.00	complete	VH- List of voters who voted in the Nov 4th General Election 2014, Statewide, in active and suspense status.	

201403366	2/17/15	Sam Spahn	\$ 1,178.03	\$ 1,178.03	\$0.00	complete	VD- List of Registered Voters in active and suspense status, statewide, Hispanic Surname Flagged.
20140337	2/19/15	Alex Lucas	see 20140338			cancelled	VH-voters who voted,active suspense,statewide, since 2000
20140338	2/19/15	Alex Lucas	\$ 4,538.68	\$ 4,549.68	\$11.00	cancelled	VD- registered voters ,active,suspense,statewide,tx,hispanic surname flagged
20140339	2/23/15	Rep. Shajeen - Estimate	\$ 143.70	\$ 143.70	\$0.00	ONLY ESTIMATE	VD-List of Reg voters, active suspense, collin county,several precincts.
20140340	2/23/15	Rep. Shajeen - Estimate	\$ 112.08	\$ 112.08	\$0.00	ONLY ESTIMATE	VH-List of Reg voters who voted, active & suspense, collin county several precincts, Nov 4 Election 2014
20140341	2/24/15	Tony Johnson-Estimate				ONLY ESTIMATE	
20140342	2/25/15	Calvin Freiburger				ONLY ESTIMATE	VH-Voters,active suspense,2012 General Election,statewide.
20140343	2/26/15	Debra Curti - Estimate	\$ 207.27	\$ 218.27	\$11.00	ONLY ESTIMATE	VD- Registered voters in active & suspense status, statewide who are 90 years old and above.
20140344	2/26/15	David Longstreet	\$ 1,178.55	\$ 1,189.55	\$11.00	complete	VD-List of Registered Voters statewide in active and suspense status.
20140345	2/26/15	Reuben Amaro - US District Court	See 20140351	See 20140351	See 20140351	see 20140351	VD- List of Registered Voters DIV# 7
20140346	2/26/15	Reuben Amaro - US District Court	See 20140351	See 20140351	See 20140351	see 20140351	VD- List of Registered Voters DIV# 1
20140347	2/26/15	Reuben Amaro - US District Court	See 20140351	See 20140351	See 20140351	see 20140351	VD- List of Registered Voters DIV# 2
20140348	2/26/15	Reuben Amaro - US District Court	See 20140351	See 20140351	See 20140351	see 20140351	VD- List of Registered Voters DIV# 3
20140349	2/26/15	Reuben Amaro - US District Court	See 20140351	See 20140351	See 20140351	see 20140351	VD- List of Registered Voters DIV# 5
20140350	2/26/15	Reuben Amaro - US District Court	See 20140351	See 20140351	See 20140351	see 20140351	VD- List of Registered Voters DIV# 4
20140351	2/26/15	Reuben Amaro - US District Court	\$ 550.67	\$ 627.67	\$77.00	complete	VD- List of Registered Voters DIV# 6
20140352	2/27/15	Alex Lucas	see 20140353			cancelled	VH- Voters who voted since 2008, several counties.
20140353	2/27/15	Aex Lucas	\$ 1,751.42	\$ 1,762.42	\$11.00	cancelled	VD- List of Registered Voters several counties.
20140354	3/2/15	Stephen Smith	\$ 469.49	\$ 469.49	\$0.00	ONLY ESTIMATE	VD- List of Registered Voters between 11/6/12 and 3/2/15 in suspense & active status, Statewide.
20140355	3/2/15	Senator Charles Perry				complete	
20140354A	3/2/15	National Pro-Life Alliance				complete	VH- Voters active & suspense, who voted in the 2014 General, 2012 General, 2014 Primary & runoff, 2012 primary & runoff
20140356	3/3/15	NOT USED				NOT USED	
20140357	3/3/15	Rep. Lamar Smith	\$ 94.94	\$ 94.94	\$0.00	complete	VD-List of Registered Voters with only active status, with Texas mailing address, who have an EDR between 2/1/15-2/28/15. For several counties and various precincts.
20140358	3/6/15	Tony Johnson	see 20140359	see 20140360	see 20140361	complete	VD-List of Registered voters in active and suspense status, statewide.
20140359	3/6/15	Tony Johnson	\$ 1,473.81	\$ 1,484.81	\$11.00	complete	VH- Voters who voted in the Nov 4th 2014, General Election, Statewide, active & suspense.
20140360	3/9/15	William Hamlin	\$ 1,179.19	\$ 1,179.19	\$0.00	complete	VD-List of Registered voters in active and suspense status, statewide, hispanic surname flagged.
20140361	3/10/15	Trent Matheson	\$ -	\$ -	\$0.00	complete	Wrong/duplicate file was provided back in beg. of 2014. Email from requestor on 3/10/15. Approved by Keith to send to requestor as the file sent to them at the beginning of last year was not correct.
20140362	3/10/15	Rep. Ted Poe	\$ 94.92	\$ 94.92	\$0.00	complete	VD-Voters active & suspense with EDR feb 2015. Statewide.
20140363	3/12/15	Bruce Anderson	\$ 95.02	\$ 106.02	\$11.00	complete	VH- Voters in active and suspense status who voted in the Nov 4 General Election 2014, Goliad County. Hispanic Surname Flagged.
20140364	3/20/15	Ash Wright				complete	VD- ALL voters both active and suspense status who registered afer Nov 6, 2012 through Feb 28 2014. Statewide. Hispanic Surname flagged.
20140365	3/23/15	Roberta Swank					
20140367	3/23/15	Roberta Swank					
20140366	3/25/15	Daniel Ball					
20140368	3/31/15	Bruce Anderson	\$ 451.75	\$ 462.75	\$11.00	Complete	VH-Voters in active & suspense status who voted in the 2014 Primary Elections, statewide, Hispanic Surname Flagged.
20140369	3/31/15	Michael Edwards - Rep. Ted Poe					
20140370	4/1/15	Rep. Lamar Smith					
20140372	4/1/15	Jeff Smith					
20140371	4/3/15	Amanda Brock					
20140373	4/7/15	Tim Smith	\$ 353.87	\$ 364.87	\$11.00	ESTIMATE	VD- List of Registered Voters, active & suspense for Collin, Denton, Dallas counties, several precincts.
20140374	4/8/15	Hal Hensley				completed	VD: State Wide VR Since 20140630, active & suspense status, hispanic surname flagged.
20140375	4/8/15	Hal Hensley				completed	VH Since 20140630 until Dec 2014, active & suspense status, hispanic surname flagged.
20140376	4/9/15	Hal Hensley				completed	VH: 1/6/15, 1/13/15, 2/17/15
20140377	4/15/15	Carolyn Lehmann	See 20140378	See 20140378	See 20140378	completed	
20140378	4/15/15	Carolyn Lehmann	\$ 886.83	\$ 886.83	\$0.00	completed	
20140379	4/17/15	Ekaterina Ksenjek	See 20140380	See 20140381	See 20140382	completed	VH- Voters who voted in 2015 Elections until present. Statewide. Active & Suspense.
20140380	4/17/15	Ekaterina Ksenjek	\$ 1,188.94	\$ 1,188.94	\$0.00	completed	VD- List of Registered Voters. Statewide. Active & Suspense.
20140382	4/21/15	Northern District Court - Gail O'Neal				ESTIMATE ONLY	VD- List of Registered voters in 100 counties, active & suspense.

20140381	4/22/15		Timothy J. Smith				completed	VD- List of Registered Voters, active & suspense for Collin, Denton, Dallas counties, several precincts. Hispanic Surname Flagged.	
20140383	5/5/15		Rep. Lamar Smith	\$ 95.07	\$ 95.07	\$0.00	completed	VD-List of Registered Voters with only active status, with Texas mailing address, who have an EDR between 4/1/15-4/30/15. For several counties and various precincts.	
20140384	5/6/15		Debra Curti - Texas Tech	\$ 207.29	\$ 218.29	\$11.00	completed	VD-List of Registered Voters, suspense and active status. Statewide, who are 90 years old and above.	
20140385	5/6/15		Optimistic Intelligence				DISREGARD	ESTIMATE: VH for Primary Elections 2012,2014 and General 2012,2014, active & suspense, Calhoun County	
20140386	5/6/15		Optimistic Intelligence				ESTIMATE ONLY	ESTIMATE: VH for Primary Elections 2012,2014 and General 2012,2014, active & suspense, Calhoun County	
20140387	5/12/15		Drew Ryan - ESTIMATE						
20150504	5/12/15		Northern District Court - Gail O'Neal/Behind Scenes	\$ 550.91	\$ 561.91	\$11.00	Complete	VD- List of Registered voters in 100 counties, active & suspense.	
20140388	5/14/15		John Claybrook	\$ 1,184.57	\$ 1,184.57	\$0.00	Complete	VD-List of Registered Voters, active & suspense status, statewide.	
20140390	5/20/15		Rep. Phil King				ESTIMATE		
20140391	5/20/15		Rep. Phil King				ESTIMATE		
20140392	5/20/15		Rep. Phil King				ESTIMATE		
20140393	5/20/15		Rep. R. D. "Bobby" Guerra	\$ 128.64	\$ 128.64	\$0.00	complete	VD-List of Registered Voters with Texas Mailing Address, active status, Hidalgo County, several precincts.	
20140394	5/20/15		Nation Builder - James Harrold	\$ 818.79	\$ 818.79	\$0.00	complete	VH-List of Registered voters in active and suspense status who voted in the 2014 and 2015 (present) elections. Statewide.	
20140395	5/21/15		Drew Ryan				Withdrawn	Do not have to run PIR. Withdrawn next day.	
201403966	5/21/15		Impact Info Inc., Richard Andro	\$ 1,181.35	\$ 1,192.35	\$11.00	complete	VD - List of Registered Voters in active & suspense status, with Texas mailing address, statewide.	
20140397	6/1/15		Rep. Lamar Smith	\$ 95.22	\$ 95.22	\$0.00	complete	VD-List of Registered Voters with only active status, with Texas mailing address, who have an effective date of registration between 5/1/15-5/31/15. For several counties and various precincts.	
20140398	6/2/15		Rep. Wayne Faircloth	\$ 108.88	\$ 108.88	\$0.00	complete	VH - List of Registered Voters, Only Active Status, with Texas mailing address, who voted in the November 2014 General Elections, Chambers & Galveston Counties, several precincts.	
20140399	6/3/15		Eastern District Court - Beth Harper	\$ 461.29	\$ 472.29	\$11.00	complete	VD - List of Registered Voters, in active and suspense status, with Texas mailing address, several counties.	
20140400	6/5/15		Sam Spahn - Zachary Wellwerts				complete	VH - List of Registered Voters in active and suspense status who voted in the elections (tabs) for their respective counties.	6/10 Requestor is submitting revised spreadsheet
20140404	6/5/15		Sam Spahn - Zachary Wellwerts				complete	VH - List of Registered Voters in active and suspense status who voted in the elections (tabs) for their respective counties.	6/10 Requestor is submitting revised spreadsheet
20140406	6/5/15		Sam Spahn - Zachary Wellwerts				complete	VH - List of Registered Voters in active and suspense status who voted in the elections (tabs) for their respective counties.	6/10 Requestor is submitting revised spreadsheet
20140407	6/5/15		Sam Spahn - Zachary Wellwerts				complete	VH - List of Registered Voters in active and suspense status who voted in the elections (tabs) for their respective counties.	6/10 Requestor is submitting revised spreadsheet
20140408	6/5/15		Sam Spahn - Zachary Wellwerts				complete	VH - List of Registered Voters in active and suspense status who voted in the elections (tabs) for their respective counties.	6/10 Requestor is submitting revised spreadsheet
20140409	6/5/15		Sam Spahn - Zachary Wellwerts				complete	VH - List of Registered Voters in active and suspense status who voted in the elections (tabs) for their respective counties.	6/10 Requestor is submitting revised spreadsheet
20140410	6/5/15		Sam Spahn - Zachary Wellwerts				complete	VH - List of Registered Voters in active and suspense status who voted in the elections (tabs) for their respective counties.	6/10 Requestor is submitting revised spreadsheet
20140411	6/5/15		Sam Spahn - Zachary Wellwerts				complete	VH - List of Registered Voters in active and suspense status who voted in the elections (tabs) for their respective counties.	6/10 Requestor is submitting revised spreadsheet
20140412	6/5/15		Sam Spahn - Zachary Wellwerts				complete	VH - List of Registered Voters in active and suspense status who voted in the elections (tabs) for their respective counties.	6/10 Requestor is submitting revised spreadsheet
20140413	6/5/15		Sam Spahn - Zachary Wellwerts				complete	VH - List of Registered Voters in active and suspense status who voted in the elections (tabs) for their respective counties.	6/10 Requestor is submitting revised spreadsheet
20140414	6/5/15		Sam Spahn - Zachary Wellwerts				complete	VH - List of Registered Voters in active and suspense status who voted in the elections (tabs) for their respective counties.	6/10 Requestor is submitting revised spreadsheet
20140415	6/5/15		Sam Spahn - Zachary Wellwerts				complete	VH - List of Registered Voters in active and suspense status who voted in the elections (tabs) for their respective counties.	6/10 Requestor is submitting revised spreadsheet

20140416	6/5/15	Sam Spahn - Zachary Wellwerts				complete	VH - List of Registered Voters in active and suspense status who voted in the elections (tabs) for their respective counties.	6/10 Requestor is submitting revised spreadsheet
20140417	6/5/15	Sam Spahn - Zachary Wellwerts				complete	VH - List of Registered Voters in active and suspense status who voted in the elections (tabs) for their respective counties.	6/10 Requestor is submitting revised spreadsheet
20140418	6/5/15	Sam Spahn - Zachary Wellwerts				complete	VH - List of Registered Voters in active and suspense status who voted in the elections (tabs) for their respective counties.	6/10 Requestor is submitting revised spreadsheet
20140419	6/5/15	Sam Spahn - Zachary Wellwerts				complete	VH - List of Registered Voters in active and suspense status who voted in the elections (tabs) for their respective counties.	6/10 Requestor is submitting revised spreadsheet
20140423	6/5/15	Sam Spahn - Zachary Wellwerts				complete	VH - List of Registered Voters in active and suspense status who voted in the elections (tabs) for their respective counties.	
201404022	6/5/15	Sam Spahn - Zachary Wellwerts				complete	VH - List of Registered Voters in active and suspense status who voted in the elections (tabs) for their respective counties.	6/10 Requestor is submitting revised spreadsheet
201404033	6/5/15	Sam Spahn - Zachary Wellwerts				complete	VH - List of Registered Voters in active and suspense status who voted in the elections (tabs) for their respective counties.	6/10 Requestor is submitting revised spreadsheet
201404055	6/5/15	Sam Spahn - Zachary Wellwerts				complete	VH - List of Registered Voters in active and suspense status who voted in the elections (tabs) for their respective counties.	6/10 Requestor is submitting revised spreadsheet
2014040111	6/5/15	Sam Spahn - Zachary Wellwerts				complete	VH - List of Registered Voters in active and suspense status who voted in the elections (tabs) for their respective counties.	6/10 Requestor is submitting revised spreadsheet
20140422	6/8/15	Aly Ashton - NALEO Educational Fund				complete	Voting History: List of Registered Voters, in active and suspense status, who voted in the Nov 4 2014 General Election and 2014 Primery Elections, for Bexar, Hidalgo, Starr, Cameron, Harris.	
20140420	6/10/15	Rep. Ted Poe	\$ 96.19	\$ 96.19	\$0.00	complete	VD-List of Registered Voters with EDR of April & May 2015, active and suspense status, Harris County, several precincts	
20140421	6/11/15	Rep. Rinaldi				Withdrawn	VD-List of Registered Voters, with Texas mailing address, only active status. Statewide.	
20140424	6/17/15	Rep. Matt Shaheen	\$ 111.97	\$ 111.97	\$0.00	ESTIMATE complete	VH-Nov 4 2014	
20140425	6/17/15	Rep. Matt Shaheen	\$ 141.76	\$ 141.76	\$0.00	ESTIMATE complete	VH-Nov 4 2014 And Nov 2012	
20140426	6/17/15	Rep. Matt Shaheen	\$ 123.34	\$ 123.34	\$0.00	ESTIMATE complete	VD- Voters 45 and over	
20140427	6/17/15	Rep. Matt Shaheen	\$ 100.15	\$ 100.15	\$0.00	ESTIMATE complete	VH- Primary 2014	
20140428	6/17/15	Rep. Matt Shaheen	\$ 105.18	\$ 105.18	\$0.00	ESTIMATE complete	VH-Primary 2014 and 2012	
20140429	6/22/15	Dan Buttrey - c/o Danielle	\$ 1,188.54	\$ 1,199.54	\$11.00	complete	VD - List of Registered Voters in active & suspense status, statewide.	
20140430	6/23/15	James Harrold - Nation Builder	\$ 1,188.87	\$ 1,188.87	\$0.00	complete		
20140431	6/24/15	Rep. Will Metcaf	\$ 150.93	\$ 150.93	\$0.00	complete		
20140432	6/24/15	Rep. Travis Clardy	\$ 133.79	\$ 133.79	\$0.00	complete		
20140433	6/24/15	Rep. Charles Anderson	\$ 132.83	\$ 132.83	\$0.00	complete		
20140434	6/24/15	Rep. Tan Parker	\$ 155.89	\$ 155.89	\$0.00	complete		
20140435	6/24/15	Sen. Lois Kolkhorst	\$ 317.10	\$ 317.10	\$0.00	complete		
20140436	6/25/15	Gregory Travis					VH - List of voters who voted in the Nov 2009, Nov 2011 and Nov 2013 Elections, Harris County, Several precincts, active & suspense status.	
20140437	6/26/15	Rep. Matt Rinaldi	\$ 130.90	\$ 130.90		complete	VD- List of registered voters, with Texas Mailing Address, only active satus, Dallas county, several precincts.	
20140439	6/29/15	John Shults - The Eppstein Group					VD-	
201404388	6/29/15	Rep. Charlie Geren	\$ 137.95	\$ 137.95		complete	VD - List of registered voters, with Teks mailing address, only active voters, Tarrant County, several precincts.	
201404399	6/29/15	John Shults - The Eppstein Group					VH-	
20140440	6/30/15	Rep. Gary Vandeaer	\$ 139.67	\$ 139.67		complete		
20140441	6/30/15	Steven Ochoa				ESTIMATE complete		
20140442	6/30/15	Sam Spahn				complete		
20140443	7/1/15	Rep. Matt Shaheen				CANCELLED		
20140444	7/2/15	Rep. Scott Sanford				ESTIMATE complete		
20140445	7/2/15	Rep. John Cyrier				ESTIMATE complete		
20140446	7/2/15	Rep. Lamar Smith - Mary Hernandez				complete		
20140447	7/2/15	Carly Rose Jackson - Local Voice Solutions				complete	VD - List of Registered Voters, in active & suspense status, statewide	
20140448	7/2/15	Rep. Doug Miller				ESTIMATE complete		
20140449	7/2/15	Rep. Doug Miller				ESTIMATE complete		
20140450	7/2/15	Rep. Byron Cook	\$ 133.48	\$ 133.48		complete		
2014040116	7/2/15	Rep. Borris L. Miles	\$ 99.24	\$ 99.24	\$0.00	ESTIMATE complete	VD- List of Registered Voters, with Texas Mailing Address, only active voters for several precincts in Harris County.	
20140451	7/5/15	Bruce Anderson				complete		
20140452	7/5/15	Bruce Anderson				Cancelled	LOCAL ELECTION	

20140453	7/6/15	Rep. Matt Shaheen	\$ 113.11	\$ 113.11		complete	
20140454	7/6/15	Rep. Borris Miles				CANCELLED	
20140455	7/6/15	Rep. Borris Miles	\$ 132.12	\$ 132.12		complete	
20140456	7/8/15	Jacqueline Moran				complete	
20140457	7/8/15	Rep. Ramon Romero				DISREGARD	
20140458	7/8/15	Rep. Scott Sanford				DISREGARD	
20140459	7/8/15	Rep. John Kuempel	\$ 146.09	\$ 146.09		complete	
201404577	7/8/15	Rep. Ramon Romero				ESTIMATE complete	Only needed counts
201404588	7/8/15	Rep. Scott Sanford				ESTIMATE complete	
20140461	7/10/15	Rep. Hughes				complete	
20140462	7/10/15	Rep. Cecil Bell	\$ 139.18	\$ 139.18		complete	
20140463	7/10/15	Rep. Phil King	\$ 126.03	\$ 126.03		complete	
20140464	7/13/15	Rep. Ted Poe - Michael Edwards Washington DC				complete	
20140465	7/13/15	Rep. Wayne Smith	\$ 137.78	\$ 137.78		complete	
20140466	7/14/15	Trent Matheson - Mathew Packer				complete	
20140460	7/15/15	Senator Robert Nichols	\$ 318.53	\$ 318.53		complete	
20140472	7/15/15	Alex Lucas				DISREGARD	
20140480	7/15/15	Alex Lucas				complete	VH - List of Voters, active & suspense status, Hispanic Surname Flagged, who voted in the: 2008, 2010, 2012, 2014 General Elections, Primaries (Dem/Rep) and Primary Runoffs (Dem/Rep). Counties: Liberty, Smith, Wood, Rains, Camp, Titus, Morris, Kaufman, Henderson
201404722	7/15/15	Alex Lucas				completed	VD - List of Registered Voters, in active and suspense status, Hispanic Surname flagged, Counties: Liberty, Smith, Wood, Rains, Camp, Titus, Morris, Kaufman, Henderson
20140478	7/17/15	Rep. Scott Sanford				ESTIMATE complete	
20140479	7/20/15	Rep. Marsha Farney	\$ 94.54	\$ 94.54		complete	
20140481	7/20/15	Rep. Hughes				ESTIMATE complete	ESTIMATE
20140482	7/20/15	Rep. Molly White	\$ 130.83	\$ 130.83	\$0.00	ESTIMATE complete	
20140483	7/21/15	Sen. Rodney Ellis	\$ 288.81	\$ 288.81	\$0.00	Completed	
20140484	7/21/15	John Destefano / Eric Grawien				WAITING	needs affidavit.
20140485	7/22/15	Deke Pierce				CANCELLED	
20140486	7/22/15	Rep. Rick Galindo	\$ 134.47	\$ 134.47	\$0.00	complete	
20140487	7/22/15	Rep. Chris Paddie	\$ 244.17	\$ 244.17	\$0.00	ESTIMATE complete	
20140488	7/22/15	Rep. Chris Paddie	\$ 143.04	\$ 143.04	\$0.00	ESTIMATE complete	
20140489	7/22/15	Rep. Lyle Larson				ESTIMATE complete	
20140490	7/22/15	Rep. Lyle Larson				ESTIMATE complete	
20140491	7/22/15	Sen. Larry Taylor	\$ 293.17	\$ 293.17	\$0.00	completed	
20140492	7/23/15	Rep. Greg Bonnen	\$ 99.09	\$ 99.09	\$0.00	ESTIMATE complete	
201404933	7/23/15	Sen. Konni Burton	\$ 298.65	\$ 298.65	\$0.00	Completed	
20140494	7/24/15	Rep. Leighton Schubert	\$ 145.87	\$ 145.87	\$0.00	ESTIMATE complete	
20140495	7/27/15	Rep. Scott Sanford	\$ 112.03	\$ 112.03	\$0.00	ESTIMATE complete	
20140496	7/27/15	Rep. Scott Sanford	\$ 118.36	\$ 118.36	\$0.00	ESTIMATE complete	
20140497	7/27/15	Rep. Ed Thompson	\$ 98.66	\$ 98.66	\$0.00	ESTIMATE complete	vh- voters voted in the 2014 primaries with TX mailing address and active only. Brazoria, several precincts.
20140498	7/27/15	Rep. Ed Thompson	\$ 111.82	\$ 111.82	\$0.00	complete	VH - Voters who voted in the 2014 General elections, TX mailing address and active voters. Brazoria, several precincts.
20140517	7/27/15	Rep. Laubenberg	\$ 99.59	\$ 99.59	\$0.00	ESTIMATE complete	
20140499	7/28/15	Steve Fowler				DISREGARD	
201404999	7/28/15	Steve Fowler				complete	
20140505	7/29/15	Rep. Doug Miller	\$ 105.99	\$ 105.99	\$0.00	complete	
20140507	7/29/15	Sen. Paul Bethancourt	\$ 316.28	\$ 316.28	\$0.00	complete	
20140508	7/29/15	Sen. Birdwell				Disregard	
201405088	7/29/15	Sen. Birdwell	\$ 309.60	\$ 309.60	\$0.00	complete	
20140509	7/30/15	Steven Ochoa				complete	
20140510	7/30/15	Steven Ochoa				complete	
20140500	7/31/15	Rep. Elkins				Disregard	
20140501	7/31/15	Rep. Rodney Anderson				Disregard	
20140502	7/31/15	Rep. Workman	\$ 122.61	\$ 122.61	\$0.00	complete	
20140503	7/31/15	Rep. Allen Fletcher	\$ 100.06	\$ 100.06	\$0.00	complete	
20140504	7/31/15	Rep. Dukes	\$ 131.96	\$ 131.96	\$0.00	complete	
20140506	7/31/15	Rep. Rodney Anderson	\$ 126.31	\$ 126.31	\$0.00	complete	
201405000	7/31/15	Rep. Elkins	\$ 136.55	\$ 136.55	\$0.00	complete	
201405011	7/31/15	Rep. Rodney Anderson				Disregard	
20140511	8/3/15	Sen. Zaffirini	\$ 334.93	\$ 334.93		complete	
20140512	8/3/15	Sen. Bob Hall	\$ 235.77	\$ 235.77		complete	
20140514	8/3/15	Rep. Hughes	\$ 105.39	\$ 105.39	\$0.00	complete	
20140515	8/3/15	Rep. Frullo	\$ 111.76	\$ 111.76		complete	
20140516	8/3/15	Sen. Watson	\$ 321.37	\$ 321.37		complete	
20140518	8/3/15	Rep. Morrison	\$ 141.44	\$ 141.44		complete	
20140519	8/3/15	Rep. Romero	\$ 99.92	\$ 99.92		complete	
201405133	8/3/15	Rep. Lamar Smith - Mari Hernandez	\$ 95.18	\$ 95.18	\$0.00	complete	

20140520	8/4/15	8/24/15	Ronnie Young	\$ 141.66	\$ 152.66	\$11.00	ESTIMATE complete	VD-active and suspense voters, several counties, several precincts.
20140521	8/4/15	8/24/15	Rep. Carol Alvarado	\$ 124.42	\$ 124.42		complete	
20140522	8/4/15	8/24/15	Rep. Dale				ESTIMATE complete	
20140523	8/4/15	8/24/15	Rep. Landgraf				ESTIMATE	
20140524	8/4/15	8/24/15	Rep. Landgraf	\$ 109.63	\$ 109.63		complete	
20140525	8/4/15	8/24/15	Rep. Landgraf	\$ 154.78	\$ 154.78		complete	
20140526	8/5/15	8/25/15	Senator Menendez	\$ 294.44	\$ 294.44		complete	
20140527	8/5/15	8/25/15	Jeff Smith - Opinion Analysts				complete	
20140528	8/5/15	8/25/15	Rep. Greg Bonnen				ESTIMATE	
20140529	8/5/15	8/25/15	Ekaterina Ksenjek	see 20140530	see 20140530	see 20140530	complete	VD-list of voters, active and suspense. Statewide.
20140530	8/5/15	8/25/15	Ekaterina Ksenjek	\$ 1,199.80	\$ 1,199.80	\$0.00	complete	VH-list of voters, active and suspense, voted in all 2015 elections until 8/11/15. statewide.
20140531	8/5/15	8/25/15	Rep. White	\$ 148.30	\$ 148.30	\$0.00	complete	VD - Voters with TX mailing address, only active voters, several counties.
20140532	8/6/15	8/26/15	Rep. Ana Hernandez	\$ 123.35	\$ 123.35	\$0.00	complete	VD-Voters in active status, with TX mailing address, Harris County (several precincts).
20140533	8/6/15	8/26/15	Rep. Scott Sanford	\$ 112.06	\$ 112.06	\$0.00	complete	VH - Voters with TX mailing address, between the ages of 45 and 99, active, voted in the 2012 General Election. Collin County, several precincts.
20140534	8/6/15	8/26/15	Sen. Charles Perry				DISREGARD request came from Keith	
20140535	8/6/15	8/26/15	Rep. Morgan Meyer				ESTIMATE	
201405344	8/6/15	8/26/15	Sen. Charles Perry	\$ 300.81	\$ 300.81	\$0.00	complete	VD-Voters with TX mailing address, active voters. Several counties and precincts.
20140536	8/7/15		Sen. Juan Hinojosa	\$ 293.95	\$ 293.95	\$0.00	complete	VD Voters with TX mailing address, several counties and precincts, active status.
20140537	8/10/15		Rep. Rick Miller	\$ 218.44	\$ 218.44	\$0.00	complete	VH-Voters with TX mailing address, active, voted in the 2010,2012,2014 Primary and General Elections R & D Fort Bend County (several precincts).
20140538	8/10/15		Rep. John Cyrier	\$ 131.99	\$ 131.99	\$0.00	ESTIMATE	ESTIMATE. VD. Voters with TX mailing address, active, Bastrop and Lee counties, General Elections 2008-2015.
20140539	8/11/15		Rep. Dennis Paul	\$ 142.42	\$ 142.42		complete	
20140540	8/11/15		Sen. Don Huffines				PAYING WITH CREDIT CARD	PAYING WITH CREDIT CARD
20140541	8/11/15		Rep. Jeff Leach				DISREGARD	
20140542	8/11/15		Rep. Leighton Schubert	\$ 145.04	\$ 145.04	\$0.00	ESTIMATE	ESTIMATE - VD voters with TX mailing address, active, who voted in the 2012 and 2014 general elections several counties and precincts.
20140543	8/11/15		Rep. Toni Rose	\$ 127.42	\$ 127.42	\$0.00	complete	VD- Voters with TX mailing address in active status only. Dallas County, several precincts.
201405411	8/11/15		Rep. Jeff Leach	\$ 105.72	\$ 105.72	\$0.00	ESTIMATE	ESTIMATE - voters with TX mailing address, active, who voted in the 2014 and 2012 Primaries, Collin County, several precincts.
20140544	8/12/15		Rep. Donna Howard	\$ 148.83	\$ 148.83	\$0.00	complete	VD - Voters with TX mailing address, only active, Travis County (several precincts).
20140545	8/12/15		Rep. Lyle Larson	\$ 243.75	\$ 243.75		complete	
20140546	8/12/15		Rep. Brooks Landgraf	\$ 126.41	\$ 126.41		complete	
20140555	8/12/15		Rep. John Wray	\$ 109.75	\$ 109.75	\$0.00	ESTIMATE	ESTIMATE vh - voters with TX mailing address, active only, voted in the 2014 Primary and primary runoff. Ellis and Henderson.
20140547	8/13/15		Rep. Stuart Spitzer	\$ 111.72	\$ 111.72		complete	
20140548	8/13/15		Rep. Dustin Burrows	\$ 139.93	\$ 139.93		complete	
20140549	8/13/15		Rep. Laubenberg	\$ 104.42	\$ 104.42		complete	
20140550	8/13/15		Rep. Oliveira	\$ 103.82	\$ 103.82		complete	
20140551	8/13/15		Rep. Armando Walle	\$ 120.31	\$ 120.31		complete	
20140552	8/13/15		Rep. Gene Wu	\$ 115.50	\$ 115.50		complete	
20140553	8/13/15		Rep. Drew Darby	\$ 135.31	\$ 135.31		complete	
20140554	8/13/15		Rep. Abel Herrero	\$ 106.52	\$ 106.52		complete	
20140556	8/14/15		Rep. Eric Johnson	\$ 134.42	\$ 134.42		complete	
20140557	8/14/15		Rep. Marisa Marquez	\$ 107.13	\$ 107.13		complete	
20140558	8/14/15		Rep. Tom Craddick	\$ 133.76	\$ 133.76		complete	
20140559	8/14/15		Speaker Joe Straus	\$ 144.53	\$ 144.53	\$0.00	complete	VD - voters with TX mailing address, active, Bexar county, several precincts.
20140560	8/14/15		Rep. Kyle Kacal	\$ 112.11	\$ 112.11		complete	
20140561	8/14/15		Rep. Ron Reynolds	\$ 138.68	\$ 138.68		complete	
20140562	8/14/15		Rep. Dade Phelan	\$ 113.04	\$ 113.04		complete	
20140563	8/14/15		Rep. Angie Chen Button	\$ 133.27	\$ 133.27		complete	
20140564	8/14/15		Rep. Cesar Blanco	\$ 98.54	\$ 98.54		complete	
20140565	8/14/15		Rep. Ryan Guillen	\$ 242.05	\$ 242.05		complete	
20140566	8/14/15		Rep. Matt Krause	\$ 134.14	\$ 134.14		complete	
20140569	8/14/15		Rep. Chris Paddie	\$ 244.07	\$ 244.07		complete	

20140570	8/14/15	Rep. Greg Bonnen	\$ 113.48	\$ 113.48		complete	VH-List of voters in the 2014 General Elections, only active voters with TX mailing address for Galveston Cty, several precincts.
20140567	8/17/15	Rep. Nicole Collier	\$ 105.50	\$ 105.50		complete	
20140568	8/18/15	Rep. Tony Tinderholt	\$ 139.27	\$ 139.27		complete	
20140571	8/19/15	Matthew Isbell	\$ 413.23	\$ 424.23	\$11.00	complete	VH-Voters in active and suspense status who voted in the 2012 republican primary, statewide.
20140572	8/20/15	Rep. Sarah Davis	\$ 218.85	\$ 218.85	\$0.00	complete	VH- List of voters, with TX mailing address, active, voted in the General Elections of 2008, 2010, 2012, 2014. Harris County. Several Precincts.
20140573	8/20/15	Rep. John Zerwas	\$ 142.70	\$ 142.70		complete	VD-List of voters with TX mailing address, only active, Fort Bend (several precincts).
20140574	8/20/15	Sen. Craig Estes				Disregard	
20140575	8/21/15	Eric Jerome - Johnny DeStefano	\$ 1,194.28	\$ 1,194.28	\$0.00	ESTIMATE	ESTIMATE ONLY.
20140576	8/21/15	Eric Jerome - Johnny DeStefano	\$ 816.08	\$ 816.08	\$0.00	ESTIMATE	ESTIMATE ONLY.
20140577	8/21/15	Eric Jerome - Johnny DeStefano	\$ 3,898.04	\$ 3,898.04		ESTIMATE	ESTIMATE ONLY.
201405744	8/21/15	Sen. Craig Estes	\$ 318.09	\$ 318.09		complete	VD
20140578	8/24/15	Rep. John Wray	\$ 109.74	\$ 109.74		complete	VH-List of voters, with TX mailing address, only active status, who voted in the 2014 Primary and runoff Elections.
20140579	8/25/15	Leah Potts - icitizen Corp.					
20140580	8/25/15	Jim Harrold-Nation Builder	\$ 207.04	\$ 207.04	\$0.00	complete	VH-Voters in active and suspense status who voted in all elections after the Nov 4 2014 Election.
20140581	8/25/15	Dan Ball	See 20140586	See 20140586	See 20140586	complete	See 20140586
20140582	8/25/15	Dan Ball	See 20140586	See 20140586	See 20140586	complete	See 20140586
20140583	8/25/15	Dan Ball	See 20140586	See 20140586	See 20140586	complete	See 20140586
20140584	8/25/15	Dan Ball	See 20140586	See 20140586	See 20140586	complete	See 20140586
20140585	8/25/15	Dan Ball	See 20140586	See 20140586	See 20140586	complete	See 20140586
20140586	8/25/15	Dan Ball	\$ 593.04	\$ 593.04	\$0.00	complete	VH- List of Registered Voters, in active and suspense status, statewide, TX, who voted in several elections.
20140587	8/27/15	John Andersen	\$ 1,194.40	\$ 1,194.40	\$0.00	complete	VD-List of voters, active and suspense, Hispanic surname flagged, Statewide.
20140588	8/28/15	Sen. Sylvia Garcia	\$ 272.07	\$ 272.07	\$0.00	complete	VD-List of voters, with TX mailing address, active status, harris County, several precincts.
20140589	8/28/15	Phillip Wiland	\$ 817.60	\$ 828.60	\$11.00	complete	VH-list of voters active and suspense status, who voted in the 2014 Primary and General Elections, Hispanic Surnmae Flagged, Statewide.
20140590	8/28/15	Rep. Sergio Munoz	\$ 99.21	\$ 99.21		complete	VH-List of voters with TX mailing address, active, who voted in the 2014 Primary Elections, Hidalgo County, Several Precincts.
20140591	8/28/15	Rep. Farrar	\$ 128.52	\$ 128.52		complete	VD- List of Registered voters with TX mailing address, active, Harris County (several precincts).
20140592	8/31/15	Daniel Ichinose	See 20140593	See 20140593	See 20140593	complete	VD- voters, active and suspense, statewide.
20140593	8/31/15	Daniel Ichinose	\$ 2,464.59	\$ 2,475.59	\$11.00	complete	VH- voters in active and suspense status, statewide, who voted on the General Elections 2014,2012,2010 and primaries 2014, 2012.
20160001	9/1/15	Rep. Lamar Smith - Mari Hernandez	\$ 95.45	\$ 95.45	\$0.00	complete	VD-List of Registered voters with only active status, with Texas mailing address, who have an EDR date of 8/1/15-8/31/15. Several Counties and various precincts.
20160002	9/2/15	Rep. Ted Poe - Michael Edwards Washington DC	\$ 96.62	\$ 96.62	\$0.00	complete	VD - Voters, active and suspense, who are registered to vote Harris County, between 7/1-8/31, 2015, various precincts.
20160003	9/3/15	Sen. Carlos Uresti				DISREGARD	
20160004	9/3/15	Sen. Carlos Uresti	\$ 288.42	\$ 288.42	\$0.00	complete	VD - Voters with Texas Mailing Address, active and suspense voters, several counties and precincts.
20160005	9/8/15	Justin Gargiulo					
20160006	9/9/15	Victoria Moreland	\$ 318.87	\$ 329.87	\$11.00	complete	VD-Voters in active and suspense status, several counties and precincts.
20160007	9/11/15	Rep. Tony Dale	\$ 138.50	\$ 138.50		complete	
20160008	9/15/15	Jim Harrold-Nation Builder	\$ 1,197.47	\$ 1,197.47	\$0.00	complete	VD-List of voters in active and suspense status, statewide.
20160009	9/15/15	Rep. schubert				DISREGARD	
201600099	9/15/15	Rep. schubert	\$ 138.35	\$ 138.35	\$0.00	ESTIMATE	ESTIMATE ONLY.
20160010	9/18/15	Derek Ryan	\$ 203.96	\$ 214.96	\$11.00	complete	VH- List of Voters, in active and suspense status, who voted in the 2012 May Primary Election (Rep and Dem). Various Counties.
20160011	9/18/15	Derek Ryan	\$ 1,198.37	\$ 1,209.37	\$11.00	complete	VD- list of voters, in active and suspense satus, statewide.
20160012	9/18/15	Derek Ryan	\$ 108.79	\$ 119.79	\$11.00	complete	VH - list of voters, in active and suspense , who voted in the 2014 Nov General Election. Various Counties.
20160013	9/18/15	Derek Ryan	\$ 98.52	\$ 109.52	\$11.00	complete	VH - list of voters, active and suspense status, who voted in the 2014 March primaries DEM AND REP, various counties.
20160014	9/21/15	Rep. John Cyrier	See 20160018	See 20160018		complete	VH- List of voters with in state mailing address and with active status that voted in several elections.
20160015	9/21/15	Rep. Terry Canales	\$ 121.88	\$ 121.88		complete	VH-List of voters, with TX mailing address, only active voters, Hidalgo County, several precincts.
20160018	9/21/15	Rep. John Cyrier	\$ 124.84	\$ 124.84		complete	VH- List of voters with in state mailing address and with active status that voted in several elections.

20160016	9/22/15		Dan Buttrey						
20160017	9/22/15		Rep. schubert	\$ 136.04	\$ 136.04	\$0.00	complete	VH- Voters with in state mailing address, active, between 40 and 85 yrs old, voted in 2012 and 2014 General Elections, several counties, several precincts.	
20160021	9/23/15		Rep. Riddle	\$ 144.61	\$ 144.61	\$0.00	complete	VD - Voters, with TX mailing address, active, Harris county. Several precincts.	
20160022	9/23/15		Rep. Riddle	\$ 141.43	\$ 141.43	\$0.00	complete	VH - Voters who voted in the 2012 and 2014 General Election, with TX mailing address, only active, Harris county, several precincts.	
20160023	9/23/15		Rep. Leighton Schubert				DISREGARD #.		
20160024	9/28/15		Rep. Four Price	\$ 105.25	\$ 105.25	\$0.00	complete	VH- List of voters with Tx mailing address, active only, voted in the 2014 Nov General Election. Several counties.	
20160025	9/29/15		Rep. Marsha Farney	\$ 107.78	\$ 107.78	\$0.00	complete	VH-List of voters who voted in the 2014 General Election, with TX mailing addresss only active voters, partial, some counties.	
20160019	9/30/15		Rep. Murr				ESTIMATE ONLY COUNTS	ESTIMATE count of voters who voted in the May 2014 Runoff Elections DEM, Statewide.	
20160020	9/30/15		Rep. Murr				ESTIMATE ONLY COUNTS	ESTIMATE count of voters who voted in the May 2014 Runoff Elections REP, Statewide.	
20160026	9/30/15		Matthew Isbell	\$ 411.38	\$ 422.38	\$11.00	complete	VH - Voters who voted in the 2014 march rep primary, active and suspense, Hispanic flagged, statewide.	
20160027	9/30/15		Alex Lucas	\$ 321.62	\$ 332.62	\$11.00	complete	VH - Voters who voted in the 2008, 2010, 2012, 2014. General, Primary and Primary Runoffs. Active and suspense, Hispanic flag, several counties.	
20160028	10/1/15		Rep. Rick Miller				DISREGARD#		
20160029	10/1/15		Dustin Matocha	\$ 390.76	\$ 401.76	\$11.00	complete	VD- Voters in active and suspense status, residing in Tarrant County.	
201600288	10/1/15		Rep. Rick Miller	\$ 117.87	\$ 117.87	\$0.00	complete	VH: voters who voted in the 2014 general and primary elections. With TX mailing address only, active voters, Fort Bend, several precincts.	
20160030	10/2/15		Senator Rodriguez				DISREGARD#		
20160031	10/2/15		Rep. DeWayne Burns	\$ 138.85	\$ 138.85		ESTIMATE	ESTIMATE ONLY.	
20160036	10/2/15		Rep. Harold V Dutton, Jr.	\$ 129.82	\$ 129.82		complete	VD-Voters with TX mailing address, active voters, Harris County. Several Precincts.	
2016003000	10/2/15		Senator Rodriguez	\$ 296.93	\$ 296.93	\$0.00	complete	VD-List of voters, with TX mailing address, active, several counties.	
20160032	10/5/15		Rep. Lamar Smith	\$ 95.66	\$ 95.66	\$0.00	complete	VD - Voters with active status, with TX mailing addresss, who have a EDR between 9/1/15-9/30/15. Several counties and various precincts.	
201600377	10/8/15	10/28/15	John DeStefano/Eric Jerome						
201600333	10/8/15	10/28/15	John DeStefano/Eric Jerome						
20160034	10/12/15		Rep. Cyrier	\$ 105.37	\$ 105.37	\$0.00	complete	VD - Voters with TX mailing address, active, who voted in the 2012 and 2014 General and Primary Elections. Karnes and Gonzales counties.	
20160035	10/12/15	10/30/15	Setliff	See PIR# 201600388	See PIR# 201600388	See PIR# 201600388	complete	VD-All individual voters with a voter status of 'Suspense, Active' and that reside in various counties.	
201600388	10/12/15	10/30/15	Setliff	\$ 795.56	\$ 806.56	\$11.00	complete	VD-All individual voters with a voter status of 'Suspense, Active' and that voted in election[s] '2000-APRIL 11TH PRIMARY RUNOFF, 2008 DEMOCRATIC PRIMARY RUNOFF ELECTION, 2008 REPUBLICAN RUNOFF PRIMARY ELECTION, 2008 May 10th Elections, 2000 NOVEMBER 7TH GENERAL ELECTION, 2008 NOVEMBER 4TH GENERAL ELECTION, 2001 NOV. 6TH CONSTITUTIONAL AMENDMENT ELECTION, 2008 - Special Election for St. Senate District 17, 2002 - MARCH 12TH GENERAL PRIMARY ELECTION, 2009 - NOV. 3RD CONSTITUTIONAL AMENDMENT ELECTION, 2002 - APRIL 9TH PRIMARY RUNOFF ELECTION, 2010 DEMOCRATIC PRIMARY ELECTION, 2010 REPUBLICAN PRIMARY ELECTION, 2002-NOVEMBER 5TH GENERAL ELECTION, 2010 APRIL 13TH REPUBLICAN PRIMARY RUNOFF, 2003 - SEPT. 13TH CONSTITUTIONAL ADMEND. ELECTION, 2010 NOVEMBER 2ND GENERAL ELECTION, 2004-MARCH 9TH GENERAL PRIMARY ELECTION, 2004-APRIL 13TH - PRIMARY RUNOFF ELECTION, 2011 NOVEMBER 8TH CONSTITUTIONAL AMEND. ELECTION, 2004 - NOVEMBER 2ND - GENERAL ELECTION, 2012 MAY 29TH DEMOCRATIC PRIMARY, 2012 MAY 29TH REPUBLICAN PRIMARY, NOVEMBER 8TH CONSTITUTIONAL AMEND. ELECTION, 2012 APRIL 21 DEMOCRATIC CONVENTION, 2012 APRIL 14 REPUBLICAN CONVENTION, 2012 APRIL 21 REPUBLICAN CONVENTION, MARCH 7, 2006 GENERAL PRIMARY ELECTION, 2006 - APRIL 11TH PRIMARY RUNOFF ELECTION, 2006 - NOVEMBER 7 - GENERAL ELECTION, 2012 JULY 31ST REPUBLICAN PRIMARY RUNOFF, 2012 JULY 31ST DEMOCRATIC PRIMARY RUNOFF, 2012 NOVEMBER 6TH GENERAL ELECTION, 2013 NOV. 5TH CONSTITUTIONAL AMEND., 2014 MARCH 4TH	

20160039	10/16/15	11/6/15	Michael Espinoza				Disregard -Ouput too large had to run several requests	
201600391	10/16/15		Michael Espinoza	See PIR# 201600399			complete	VH-Voters who voted in Harris County, several elections, suspense active. Hispanic Surname Flagged.
201600392	10/16/15		Michael Espinoza	See PIR# 201600399			complete	VH-Voters who voted in Harris County, several elections, suspense active. Hispanic Surname Flagged.
201600393	10/16/15		Michael Espinoza	See PIR# 201600399			complete	VH-Voters who voted in Harris County, several elections, suspense active. Hispanic Surname Flagged.
201600394	10/16/15		Michael Espinoza	See PIR# 201600399			complete	VH-Voters who voted in Harris County, several elections, suspense active. Hispanic Surname Flagged.
201600395	10/16/15		Michael Espinoza	See PIR# 201600399			complete	VH-Voters who voted in Harris County, several elections, suspense active. Hispanic Surname Flagged.
201600396	10/16/15		Michael Espinoza	See PIR# 201600399			complete	VH-Voters who voted in Harris County, several elections, suspense active. Hispanic Surname Flagged.
201600397	10/16/15		Michael Espinoza	See PIR# 201600399			complete	VH-Voters who voted in Harris County, several elections, suspense active. Hispanic Surname Flagged.
201600398	10/16/15		Michael Espinoza	See PIR# 201600399			complete	VH-Voters who voted in Harris County, several elections, suspense active. Hispanic Surname Flagged.
201600399	10/16/15		Michael Espinoza	\$ 711.54	\$ 722.54	\$11.00	complete	VH-Voters who voted in Harris County, several elections, suspense active. Hispanic Surname Flagged.
20160040	10/20/15		Dan Ball				complete	VD - List of Registered Voters in active and suspense status, statewide. Hispanic Surname Flagged.
20160041	11/3/15		Rep. Lamar Smith / Mari Hernandez	\$ 96.04	\$ 96.04	\$0.00	complete	
20160042	11/4/15		Schaefer				ESTIMATE	
20160045	11/4/15		Schaefer				complete	
20160043	11/9/15		Rep. Ted Poe/Michael Edwards				complete	
20160044	11/12/15		Stephen Smith				ESTIMATE	
20160046	11/13/15		Senator Huffines	\$ 99.92	\$ 110.92	\$11.00	complete	All individual voters with an in state mailing address and with a voter status of 'Active' and that reside in 'DALLAS (2928), DALLAS (2926), DALLAS (2925), DALLAS (2924), DALLAS (2923)'
20160047	11/13/15		Ash Wright - Avrey-Stephen Smith-George Busch Campaign				complete	VD - List of Registered Voters, active and suspense status, Statewide, Hispanic Surname Flagged.
20160048	11/13/15		Ash Wright - Avrey-Stephen Smith-George Busch Campaign				complete	VH - Voters who voted, statewide, all elections, hispanic surname flagged.
20160049	11/13/15		Ash Wright - Avrey-Stephen Smith-George Busch Campaign				complete	
20160050	11/13/15		Ash Wright - Avrey-Stephen Smith-George Busch Campaign				complete	
20160052	11/13/15		Ash Wright - Avrey-Stephen Smith-George Busch Campaign				complete	
20160053	11/13/15		Ash Wright - Avrey-Stephen Smith-George Busch Campaign				complete	
20160054	11/13/15		Jim Harrold				WITHDRAWN	
20160051	11/13/15		Ash Wright - Avrey-Stephen Smith-George Busch Campaign				complete	
20160055	11/17/15		Robert McNutt				In Process	
20160056	11/18/15		Senator Menendez	\$ 289.70	\$ 289.70	\$0.00	complete	VD-Voters with in state mailing address, active only, Bexar County several precincts.
20160057	11/24/15		Assessure Systems, LLC - Michael Sarver				WITHDRAWN	
20160058	11/24/15		David J. Villalobos	\$ 143.63	\$ 154.63	\$11.00	ESTIMATE	VH- ESTIMATE. List of Voters in active and suspense status who voted in the 2012 and 2014 Primary and General Elections, Dallas County: several precincts
20160083	12/28/15		John Andersen	\$ 1,121.35	\$ 1,121.35	\$0.00	complete	VD - List of Registered Voters, active and suspense status, statewide. Hispanic Surname Flagged.
20160084	12/28/15		Michael Sarver - Assessure Systems	See PIR 201600921			complete	VD - List of Registered Voters, active and suspense status, statewide.
20160085	12/28/15		Michael Sarver - Assessure Systems	\$ -			DISREGARD	VH 1996-1999
20160086	12/28/15		Michael Sarver - Assessure Systems	\$ -			DISREGARD	VH 2000-2003
20160087	12/28/15		Michael Sarver - Assessure Systems	\$ -			DISREGARD	VH 2004-2005
20160088	12/28/15		Michael Sarver - Assessure Systems	\$ -			DISREGARD	VH 2006-2008
20160089	12/28/15		Michael Sarver - Assessure Systems	\$ -			DISREGARD	VH 2009-2011
20160090	12/28/15		Michael Sarver - Assessure Systems	\$ -			DISREGARD	VH 2012-2013
20160091	12/28/15		Michael Sarver - Assessure Systems	\$ -			DISREGARD	VH 2014
20160092	12/28/15		Michael Sarver - Assessure Systems	\$ -			DISREGARD	VH 2015
201600855	12/28/15		Michael Sarver - Assessure Systems	See PIR 201600921			complete	
201600866	12/28/15		Michael Sarver - Assessure Systems	See PIR 201600921			complete	
201600877	12/28/15		Michael Sarver - Assessure Systems	See PIR 201600921			complete	
201600888	12/28/15		Michael Sarver - Assessure Systems	See PIR 201600921			complete	
201600899	12/28/15		Michael Sarver - Assessure Systems	See PIR 201600921			complete	
201600900	12/28/15		Michael Sarver - Assessure Systems	See PIR 201600921			complete	
201600911	12/28/15		Michael Sarver - Assessure Systems	See PIR 201600921			complete	
201600921	12/28/15		Michael Sarver - Assessure Systems	\$ 4,806.27	\$ 4,817.27	\$11.00	complete	VD & VH
20160093	1/13/16		Mr. Coby - Estimate-Keith	\$ -			ESTIMATE	Bexar County - 2010-2015 VH.

20160094	1/4/16	Chris Nicholson	\$ -			DISREGARD	VH- Rep. Primary 2014. Several Counties.
20160094	1/4/16	Chris Nicholson	\$ 96.28	\$ 107.28	\$11.00	complete	VH- Rep. Primary 2014. Several Counties.
20160095	1/4/16	Shelly Marshall	\$ -			DISREGARD	VH-REP & DEM Primary 2012, General 2015. several counties.
20160095	1/4/16	Shelly Marshall	\$ 94.94	\$ 105.94	\$11.00	complete	VH-REP & DEM Primary 2012, General 2015. several counties.
20160096	1/4/16	Debra Myers / Fort Bend Independent Newspaper	\$ -			DISREGARD	VH - Elections 2004-20006. Active & Suspense. Statewide.
20160097	1/4/16	Debra Myers / Fort Bend Independent Newspaper	\$ -			DISREGARD	VH - Elections 2007-20009. Active & Suspense. Statewide.
20160098	1/4/16	Debra Myers / Fort Bend Independent Newspaper	\$ -			DISREGARD	VH - Elections 2010-2012. Active & Suspense. Statewide.
20160099	1/4/16	Debra Myers / Fort Bend Independent Newspaper	\$ -			DISREGARD	VH - Elections 2013-2014. Active & Suspense. Statewide.
20160100	1/4/16	Debra Myers / Fort Bend Independent Newspaper	\$ -			DISREGARD	VH - Elections 2015. Active & Suspense. Statewide.
201600966	1/4/16	Debra Myers / Fort Bend Independent Newspaper	See PIR# 201601000	See PIR# 201601000	See PIR# 201601000	complete	VH - Elections 2004-20006. Active & Suspense. Statewide.
201600977	1/4/16	Debra Myers / Fort Bend Independent Newspaper	See PIR# 201601001	See PIR# 201601000	See PIR# 201601000	complete	VH - Elections 2007-20009. Active & Suspense. Statewide.
201600988	1/4/16	Debra Myers / Fort Bend Independent Newspaper	See PIR# 201601002	See PIR# 201601000	See PIR# 201601000	complete	VH - Elections 2010-2012. Active & Suspense. Statewide.
201600999	1/4/16	Debra Myers / Fort Bend Independent Newspaper	See PIR# 201601003	See PIR# 201601000	See PIR# 201601000	complete	VH - Elections 2013-2014. Active & Suspense. Statewide.
201601000	1/4/16	Debra Myers / Fort Bend Independent Newspaper	\$ 3,246.49	\$ 3,257.49	\$11.00	complete	VH - Elections 2015. Active & Suspense. Statewide.
20160101	1/4/16	Dustin Matocha	\$ 1,148.73	\$ 1,159.73	\$11.00	complete	VD-Voters, active and suspense, all counties except, Tarrant County.
20160102	1/6/16	Congressman Lamar Smith	\$ -			In Process	VD-Registered Voters with EDR 12/1/15-12/31/15. With TX mailing address, only active voters. Several Counties. District 21.
20160103	1/6/16	Jeff Smith - Opinion Analysts	\$ -			DISREGARD	
201601033	1/6/16	Jeff Smith - Opinion Analysts	\$ 364.47	\$ 375.47	\$11.00	complete	VH- Voters, active and suspense, who voted in the 2015 Nov 3rd Election, Hispanic Surname Flagged, all counties except: Dallas, El Paso, Harris, Hays, Tarrant, Travis, Williamson, Fort Bend.
20160104	1/6/16	Jeff Smith - Opinion Analysts	\$ 933.09	\$ 944.09	\$11.00	complete	VD - active, suspense voters, hispanic surname flagged, all counties except: Dallas, El Paso, Harris, Hays, Travis.
20160105	1/6/16	Jared Craighead	See PIR # 20160116	See PIR # 20160116	See PIR # 20160116	complete	VH 1996-1999
20160106	1/11/16	Daniel Ball	\$ -			DISREGARD	
201601066	1/11/16	Daniel Ball	\$ 426.11	\$ 426.11	\$0.00	complete	VH-Voters, active and suspense, who voted in the Nov 3rd Election, statewide, Hispanic Surname Flagged.
20160107	1/12/16	Trent Matheson - Mathew Parker	UNABLE TO USE #	UNABLE TO USE #	UNABLE TO USE #	UNABLE TO USE #	VD
20160108	1/12/16	Trent Matheson - Mathew Parker	See PIR #20160132	See PIR #20160132	See PIR #20160132	complete	VH 1996-1999
20160109	1/12/16	Ekaterina Ksenjek	See PIR 201601100			complete	VD
20160110	1/12/16	Ekaterina Ksenjek	\$ -			DISREGARD	VH
201601100	1/12/16	Ekaterina Ksenjek	\$ 1,316.29	\$ 1,316.29		complete	VH - 2015 Elections, active and suspense, statewide.
20160111	1/6/16	Jared Craighead	See PIR # 20160116	See PIR # 20160116	See PIR # 20160116	complete	VH 2000-2003
20160112	1/6/16	Jared Craighead	See PIR # 20160116	See PIR # 20160116	See PIR # 20160116	complete	VH 2004-2006
20160113	1/6/16	Jared Craighead	See PIR # 20160116	See PIR # 20160116	See PIR # 20160116	complete	VH 2007-2009
20160114	1/6/16	Jared Craighead	See PIR # 20160116	See PIR # 20160116	See PIR # 20160116	complete	VH 2010-2012
20160115	1/6/16	Jared Craighead	See PIR # 20160116	See PIR # 20160116	See PIR # 20160116	complete	VH 2013-2014
20160116	1/6/16	Jared Craighead	\$ 3,922.44	\$ 3,933.44	\$11.00	complete	VH 2015
20160117	1/14/16	Dan Buttrey	\$ -			ESTIMATE	
20160118	1/14/16	Dan Buttrey	\$ -			DISREGARD	
201601199	1/14/16	Dustin Smith	PIR#20160120	PIR#20160120	PIR#20160120	DISREGARD	
201601200	1/14/16	Dustin Smith	\$ 1,595.34	\$ 1,606.34	\$11.00	DISREGARD	
20160121	1/14/16	Walton Taylor	See PIR# 20160133	See PIR# 20160133	See PIR# 20160133	complete	
20160122	1/20/16	INTERNAL - Alicia Pierce	\$ -				VD - Voters, active and suspense, several counties. 17 years old
20160123	1/19/16	Bruce Anderson	See PIR# 20160124	See PIR# 20160124	See PIR# 20160124	complete	VD-voters active and suspense statewide,hispanic flagged.
20160124	1/19/16	Bruce Anderson	\$ 1,313.18	\$ 1,324.18	\$11.00	complete	VH-Nov 3rd Const. Amendment Election 2015
20160125	1/21/16	Taylor Stair - John Destefano	\$ -			DISREGARD	
20160126	1/12/16	Trent Matheson - Mathew Parker	See PIR# 20160132	See PIR# 20160132	See PIR# 20160132	complete	VH 2000-2003
20160127	1/12/16	Trent Matheson - Mathew Parker	See PIR# 20160132	See PIR# 20160132	See PIR# 20160132	complete	VH 2004-2006
20160128	1/12/16	Trent Matheson - Mathew Parker	See PIR# 20160132	See PIR# 20160132	See PIR# 20160132	complete	VH 2007-2009
20160129	1/12/16	Trent Matheson - Mathew Parker	See PIR# 20160132	See PIR# 20160132	See PIR# 20160132	complete	VH-2010-2012
20160130	1/12/16	Trent Matheson - Mathew Parker	See PIR# 20160132	See PIR# 20160132	See PIR# 20160132	complete	VH-2013-2014
20160131	1/12/16	Trent Matheson - Mathew Parker	See PIR# 20160132	See PIR# 20160132	See PIR# 20160132	complete	VH- 2015
20160132	1/12/16	Trent Matheson - Mathew Parker	\$ 4,805.19	\$ 4,805.19	\$0.00	complete	VD
20160133	1/14/16	Walton Taylor	\$ 330.54	\$ 341.54	\$11.00	complete	List of Voters who voted in the 2012 and 2014 Primary and General Elections. (Several Counties and Precincts).
20160134	1/21/16	John DeStefano - Taylor Stair	\$ 1,204.28	\$ 1,215.28	\$11.00	complete	VD-active,suspense,statewide.Hispanic flagged.

20160135	1/25/16	Derek Ryan	\$ 426.03	\$ 437.03	\$11.00	complete	VH-List of Voters who voted in the Nov 3rd Constitutional Amendment Election, active and suspense, statewide, Hispanic Surname Flagged.
20160136	1/29/16	Carly Jackson	\$ -				
20160137	1/29/16	Dan Buttrey	See PIR# 20160138	See PIR# 20160138	See PIR# 20160138	complete	VD-active,suspense,statewide.Hispanic flagged.
20160138	1/29/16	Dan Buttrey	\$ 1,392.04	\$ 1,403.04	\$11.00	complete	VH - 2012 Primary Runoff DEM and REP, and 2015 Nov 3rd Election
20160139	2/1/16	Senator Huffines - paid with credit card	\$ 141.46	\$ 152.46	\$11.00	complete	paid with credit card. VD-List of Registered Voters, with TX mailing address, only active status, Dallas County, several precincts.
20160140	2/3/16	Congressman Lamar Smith	\$ 95.58	\$ 95.58	\$0.00	complete	VD - only active voters, EDR 1/1/16-1/31/16, with only TX mailing address, several counties, several precincts.
20160141	2/3/16	Andrew Hassan	\$ -			ESTIMATE	
20160142	2/3/16	Andrew Hassan	\$ -			ESTIMATE	
20160143	2/8/16	Gregory Pimentel	\$ 1,218.54	\$ 1,218.54	\$0.00	complete	VD - List of Registered Voters, active and suspense, statewide, hispanic surname flagged.
20160144	2/8/16	Derek Ryan	\$ 1,218.54	\$ 1,229.54	\$11.00	complete	VD - List of Registered Voters, active and suspense status, statewide, hispanic surname flagged.
20160145	2/8/16	Dustin Smith	\$ 403.28	\$ 414.28	\$11.00	complete	VH - Voters who voted in the 2014 Rep. Primaries, active only, TX mailing address, Statewide.
20160146	2/11/16	Tony Johnson	\$ 1,220.18	\$ 1,231.18	\$11.00	complete	VD - List of Registered Voters in active and suspense status, statewide.
20160147	2/11/16	Frank Winslett	\$ 94.41	\$ 105.41	\$11.00	complete	VH-Voters active and suspense who voted in the 2012 Primaries and in the Nov 3rd 2015 Election. Culberson & Hudspeth Counties.
20160148	2/22/16	Congressman Lamar Smith	NO CHARGE	NO CHARGE	NO CHARGE	complete	RE-RUNNING Report. No charge. As there were issues in the system when we ran PIR# 20160102. Keith approved.
20160149	2/22/16	Congressman Lamar Smith	NO CHARGE	NO CHARGE	NO CHARGE	complete	RE-RUNNING Report. No charge. As there were issues in the system when we ran PIR# 20160140. Keith approved.
20160150	2/17/16	Senator Huffines - paying with cc	\$ 116.58	\$ 127.58	\$11.00	complete	VD - List of Registered Voters, with TX mailing address, only active status, Dallas County, several precincts.
20160151	3/1/16	Congressman Lamar Smith	\$ 97.34	\$ 97.34	\$0.00	complete	Voters with TX mailing address, with EDR 2/1/16-2/29/16, only active voters, Congressional District 21.
20160152	3/3/16	John Shults	SEE PIR# 20160153	SEE PIR# 20160153	SEE PIR# 20160153	complete	VD: list of voters, active and suspense, in several counties.
20160153	3/3/16	John Shults	\$ 329.65	\$ 340.65	\$11.00	complete	VH: list of voters, active and suspense, who voted in the 2010 primary and runoff, 2012 primary and runoff, 2014 primary and runoff. Several counties.
20160154	3/3/16	John Shults	SEE PIR# 20160155	SEE PIR# 20160155	SEE PIR# 20160155	complete	VD: list of voters, active and suspense, in several counties.
20160155	3/3/16	John Shults	\$ 347.87	\$ 358.87	\$11.00	complete	VH: list of voters, active and suspense, who voted in the 2010 primary and runoff, 2012 primary and runoff, 2014 primary and runoff. Several counties.
20160156	3/4/16	Michelle Craig	DISREGARD	DISREGARD	DISREGARD	DISREGARD	RUNNING IT AGAIN.
20160157	3/7/16	John DeStefano - Taylor Stair	\$ -				
20160158	3/7/16	John DeStefano - Taylor Stair	\$ -				
20160159	3/7/16	John DeStefano - Taylor Stair	\$ -				
20160160	3/7/16	John DeStefano - Taylor Stair	\$ -				
20160161	3/7/16	John DeStefano - Taylor Stair	\$ -				
20160162	3/7/16	John DeStefano - Taylor Stair	\$ 3,900.08	\$ 3,911.08	\$11.00	complete	VH- 1996-2015.
20160163	3/4/16	Michelle Craig	See PIR # 20160164	See PIR # 20160164	See PIR # 20160164	complete	VD - Collins County. Several Precincts.
20160164	3/4/16	Michelle Craig	\$ 289.38	\$ 300.38	\$11.00	complete	VD - Dallas County. Several Precincts.
20160165	3/22/16	Alicia Pierce Request - Sean Collins Walsh	\$ 1,165.00	\$ 1,165.00		ESTIMATE	ESTIMATE
20160168	3/14/16	Carly Jackson	\$ -			ESTIMATE	In process
20160169	3/14/16	Wallace Swayze	\$ 102.50	\$ 113.50	\$11.00	COMPLETE	VH - Elections 2014 & 2015. Dallas County several precincts, active & suspense.
20160170	3/16/16	Jeff Smith - Opinion Analysts	See PIR # 20160171	See PIR # 20160171	See PIR # 20160171	COMPLETE	See PIR # 20160171
20160171	3/21/16	Jeff Smith - Opinion Analysts	\$ 1,480.78	\$ 1,502.78	\$22.00	COMPLETE	
20160172	3/22/16	Congressman Ted Poe	\$ 96.64	\$ 96.64	\$0.00	complete	VD - EDR January & February 2016.
20160173	3/23/16	Carolyn Lehmann	\$ 115.52	\$ 115.52	\$0.00	complete	VH- 2016 Republican Primary Comal, Gillespie, Kendall
20160178	3/24/16	derek ryan	See PIR 2016180	See PIR 2016180	See PIR 2016180	complete	
20160179	3/24/16	derek ryan	See PIR 2016180	See PIR 2016180	See PIR 2016180	complete	
20160180	3/24/16	derek ryan	\$ 1,385.95	\$ 1,418.95	\$33.00	complete	
20160191	4/6/16	Derek Ryan	See PIR 20160191	See PIR 20160191	See PIR 20160191	complete	VH-2012 Rep. and Dem. Primary Runoffs
20160192	4/6/16	Derek Ryan	\$ 615.37	\$ 637.37	\$22.00	complete	VH-2010 Rep. Primary Runoff
20160196	4/14/16	Lynette Fanguy	\$ -				
20160197	4/14/16	Antonio Flores - Oscar Longoria Campaign	\$ -				
20160198	4/14/16	Antonio Flores - Oscar Longoria Campaign	\$ -				
20160199	4/13/16	Bruce Anderson	\$ -				
20160200	4/13/16	Bruce Anderson	\$ -			WITHDRAWN	
20160201	4/13/16	Jeff Smith - Opinion Analysts	\$ -				
20160202	4/22/16	John Winston	\$ -			WITHDRAWN	
20160203	4/22/16	Trent Matheson - Mathew Parker	\$ -			DISREGARD NEED TO RUN AGAIN SYSTEM ISSUE	
201602033	4/22/16	Trent Matheson - Mathew Parker	\$ -			In Process	
20160204	4/26/16	Ekaterina Ksenjek	\$ -				

20160205	4/26/16		Ekaterina Ksenjek	\$	-						
20160207	4/29/16		Lynette Fanguy	\$	-						
20160208	5/2/16		Rep. Ed Thompson	\$	-						
201602099	5/2/16		Congressman Lamar Smith	\$	-						
20160210	5/2/16		Rep. Burrows	\$	139.22	\$	139.22	\$0.00	complete	VD- HD83	
20160211	5/6/16		Dan Buttrey - ESTIMATE - DANIELLE LEWIS	\$	-				ESTIMATE		
20160212	5/9/16		Jeff Smith - Opinion Analysts	\$	209.20	\$	220.20	\$11.00			
									SEVERAL CALLS AND EMAILS AND REQUESTOR DID NOT RESPOND. REQUEST WILL BE FILED. NO PMT.		
20160213	5/9/16		James Barnes	\$	-						
20160214	5/9/16		Danny Schwartz	\$	-						
20160215	5/10/16		Rep. Matt Rinaldi	\$	-						
20160216	5/11/16		Justin Gargiulo	\$	-						
20160217	5/11/16		Lee White - c/o Hutch White	\$	-					DISREGARD	
20160218	5/11/16		Lee White - c/o Hutch White	\$	-					VD	
201602188	5/11/16		Lee White - c/o Hutch White	\$	-					vh	
20160220	5/13/16		Dan Buttrey	\$	-					ESTIMATE	
20160221	5/16/16		Matt Lamon - J.M. Lozano - ESTIMATE	\$	-					ESTIMATE	
									SEVERAL CALLS AND EMAILS AND REQUESTOR DID NOT RESPOND. REQUEST WILL BE FILED. NO PMT.		
20160223	5/16/16		Anna Cruz	\$	-						
20160224	5/18/16		Rep. Faircloth	\$	-						
20160225	5/18/16		Gregory Pimentel	\$	-						
20160226	5/19/16		Rep. Scott Sanford	\$	-					ESTIMATE	
20160227	5/20/16		Rep. Zerwas	\$	-						
20160228	5/25/16		Rep. Cecil Bell	\$	-					DISREGARD	
201602288	5/25/16		Rep. Cecil Bell	\$	-						
20160229	5/26/16		Rep. Scott Sanford	\$	-					ESTIMATE	
20160230	5/27/16		Rep. Boris Miles	\$	-						
20160231	5/27/16		Rep. Scott Sanford	\$	-						
20160232	5/27/16		Rep. James White - ESTIMATE	\$	-					ESTIMATE	
20160233	6/2/16		Rep. Rodney Anderson	\$	-						
20160234	6/2/16		Rep. R. D. "Bobby" Guerra	\$	-						
20160235	6/1/16		Congressman Lamar Smith	\$	-						
20160236	6/6/16		Ekaterina Ksenjek	\$	-						
20160237	6/6/16		Rep. Shaheen - ESTIMATE	\$	-					ESTIMATE	
20160238	6/8/16		Rep. John P. Cyprier - ESTIMATE	\$	-					ESTIMATE	
20160239	6/9/16		Congressman Ted Poe	\$	-						
20160240	6/9/16		Rep. Landgraf	\$	-						
20160241	6/10/16		Rep. John Lujan - ESTIMATE	\$	-					ESTIMATE	
20160242	6/10/16		Rep. Abel Herrero - ESTIMATE	\$	-					ESTIMATE	
20160243	6/13/16		Rep. John Cyprier - ESTIMATE	\$	-					ESTIMATE	
20160244	6/13/16		Senator Huffines - paid with credit card	\$	-						
20160245	6/13/16		Rep. Kenneth Sheets - ESTIMATE	\$	-					ESTIMATE	
20160246	6/13/16		Alex Lucas		see 20160249		see 20160249		see 20160249	complete	see 20160249
20160247	6/13/16		Alex Lucas		see 20160249		see 20160249		see 20160249	complete	see 20160249
20160248	6/13/16		Alex Lucas		see 20160249		see 20160249		see 20160249	complete	see 20160249
20160249	6/13/16		Alex Lucas	\$	316.83	\$	316.83		complete	CD	
20160250	6/15/16		Jeronimo Cortina - ESTIMATE		see 20160266		see 20160267		see 20160268		
20160251	6/16/16		Rep. John Lujan - ESTIMATE-PURCHASE	\$	122.45	\$	122.45		complete	FTP	
20160252	6/16/16		Rep. Tan Parker	\$	151.81	\$	151.81		complete	FTP	
20160253	6/16/16		Rep. Ana Hernandez	\$	122.99	\$	122.99		complete	FTP	
20160254	6/17/16		Hillary Davis	\$	421.73	\$	421.73		complete	FTP	
20160255	6/22/16		Peter Slover		see 20160256		see 20160257		see 20160258	complete	
20160256	6/22/16		Peter Slover	\$	215.55	\$	215.55		complete	FTP	
20160257	6/17/16		Rep. Kenneth Sheets	\$	102.18	\$	102.18		complete	FTP	
20160258	6/22/16		Rep. James White - ESTIMATE	\$	-						
20160259	6/22/16		Senator zaffirini	\$	332.70	\$	332.70		complete	FTP	
20160260	6/15/16		Jeronimo Cortina - ESTIMATE		see 20160266		see 20160267		see 20160268		
20160261	6/15/16		Jeronimo Cortina - ESTIMATE		see 20160266		see 20160267		see 20160268		
20160262	6/15/16		Jeronimo Cortina - ESTIMATE		see 20160266		see 20160267		see 20160268		
20160263	6/15/16		Jeronimo Cortina - ESTIMATE		see 20160266		see 20160267		see 20160268		
20160264	6/15/16		Jeronimo Cortina - ESTIMATE		see 20160266		see 20160267		see 20160268		
20160265	6/15/16		Jeronimo Cortina - ESTIMATE		see 20160266		see 20160267		see 20160268		
20160266	6/15/16		Jeronimo Cortina - ESTIMATE	\$	3,633.90	\$	3,633.90		complete	FTP	
20160273	6/23/16		Rep. Reynolds	\$	-						Gloria
20160274	6/23/16		Rep. John Lujan-DISREGARD	\$	-						Lily
20160275	6/23/16		Rep. Fallon	\$	-						Emily
20160276	6/28/16		Rep. Galindo	\$	115.43	\$	115.43		complete	FTP	Brenda
20160277	6/23/16		David Holley	\$	1,125.02	\$	1,125.02		complete	FTP	Beva

20160278	6/24/16	Rep. White - ESTIMATE	\$	-					Lily	
20160279	6/24/16	Rep. Diego Bernal - ESTIMATE	\$	-					Lily	
20160280	6/28/16	Rep. Ron Simmons - ESTIMATE	\$	-					Lily	
20160281	6/28/16	Richard Andro - Impact Info Inc.	\$	1,247.86	\$	1,247.86		complete	cd	Lily
20160282	6/29/16	Daniel Ball	\$	333.57	\$	333.57		complete	FTP	Lily
20160283	6/30/16	Anna Cruz	\$	763.66	\$	763.66		complete	cd	Lily
20160284	6/30/16	Rep. Jodie Laubenberg-ESTIMATE	\$	-						Lily
20160285	6/30/16	Raymond Wotring - Market Research Foundation	\$	-						Brenda
20160286	6/30/16	Rep. John Cyrier	\$	108.59	\$	108.59		complete	FTP	Emily
20160287	7/5/16	Rep. Walle	\$	120.76	\$	120.76		complete	FTP	Gloria
20160288	7/5/16	Rep. Laubenberg-ESTIMATE	\$	-						Lily
20160289	7/5/16	Hutch White - ESTIMATE	\$	-						Lily
20160290	7/5/16	Rep. Shaheen - ESTIMATE	\$	-						Lily
20160291	6/30/16	Raymond Wotring - Market Research Foundation	\$	-						Brenda
20160292	7/5/16	Rebecca Berry	\$	-						Lily
20160293	7/5/16	Hutch White - ESTIMATE	\$	-						Lily
20160294	7/12/16	Rep. Matt Shaheen-ESTIMATE	\$	-						Brenda
20160295	7/8/16	Rep. Simmons								Beva
20160296	7/8/16	Rep. Laubenberg - ESTIMATE								Lily
20160297	7/6/16	Congressman Lamar Smith								Lily
20160298	7/11/16	Rep. Blanco								Brenda
20160299	7/11/16	Rep. Collier	\$	124.46	\$	124.46		complete	FTP	Gloria
20160300	7/11/16	Rep. Laubenberg	\$	112.34	\$	112.34		complete	ftp	Emily
20160301	7/11/16	Rep. Laubenberg	\$	117.07	\$	117.07		complete	FTP	Beva
20160302	7/12/16	Rep. Button	\$	133.06	\$	133.06		complete	FTP	Gloria
20160303	7/13/16	Rep. Phil King						DISREGARD		Emily
2016303	7/13/16	Rep. Phil King								
20160304	7/7/16	Rep. James White	\$	101.77	\$	101.77		complete	ftp	Brenda
20160305	7/11/16	Zach wellwerts	\$	333.54	\$	333.54		complete	ftp	Lily
20160306	7/11/16	Dan Buttrey - ESTIMATE - DANIELLE Gaskins								Lily
20160307	7/5/16	Hutch White - ESTIMATE	\$	1,243.34	\$	1,243.34		complete	ftp	Lily
20160308	7/14/16	Wilson Adams		see 20160309		see 20160310		see 20160311	complete	
20160309	7/14/16	Wilson Adams	\$	224.01	\$	224.01		complete	cd	
20160310	7/16/16	Jim Harrold - Nation Builder		see 20160311		see 20160311		see 20160311	complete	
20160311	7/16/16	Jim Harrold - Nation Builder	\$	1,547.46	\$	1,547.46		complete	FTP	
20160312	7/18/16	James Barnes		see 20160313		see 20160313		see 20160313	complete	cd
20160313	7/18/16	James Barnes	\$	671.12	\$	671.12		complete	cd	
20160314	7/19/16	Justin Gargiulo - ESTIMATE								
20160315	7/19/16	Justin Gargiulo - ESTIMATE								
201603155	7/19/16	Justin Gargiulo - ESTIMATE		see 2016031550		see 2016031550		see 2016031550	complete	cd
2016031555	7/19/16	Justin Gargiulo - ESTIMATE								
2016031550	7/19/16	Justin Gargiulo - ESTIMATE	\$	1,290.33	\$	1,290.33		complete	cd	
20160316	7/26/16	Rep. Rose	\$	126.85	\$	126.85	\$0.00	complete	VD-District 110	Beva
20160318	7/18/16	Rebecca Berry							Provided Clarifications	
20160319	7/18/16	Rebecca Berry								
20160320	7/18/16	Rebecca Berry								
20160321	7/27/16	Jeff Smith - Opinion Analysts		see 20160325		see 20160325		see 20160325		Beva
20160322	7/27/16	Jeff Smith - Opinion Analysts		see 20160325		see 20160325		see 20160325		Beva
20160323	7/29/16	Rep. Geanie W. Morrison	\$	141.04	\$	141.04		complete	FTP	Gloria
20160324	7/27/16	Jeff Smith - Opinion Analysts		see 20160325		see 20160325		see 20160325	complete	
20160325	7/27/16	Jeff Smith - Opinion Analysts	\$	1,520.77	\$	1,520.77		complete	cd	
20160326	7/27/16	John DeStefano - Chester Bedell	\$	630.10	\$	630.10		complete	ftp	
20160327	7/27/16	Derek Ryan		see 20160330		see 20160330		see 20160330	complete	
20160328	7/27/16	Derek Ryan		see 20160330		see 20160330		see 20160330	complete	
20160329	7/27/16	Derek Ryan		see 20160330		see 20160330		see 20160330	complete	
20160330	7/27/16	Derek Ryan	\$	529.17	\$	529.17		complete	cd	
20160331	8/4/16	Ji Su Yoo	\$	1,330.84	\$	1,330.84		complete	FTP	
20160332	8/5/16	Linda Curtis - Independent Texas	\$	141.57	\$	141.57		complete	FTP	
20160333	8/8/16	Ekaterina Ksenjek		see 20160334		see 20160334		see 20160334	complete	
20160334	8/8/16	Ekaterina Ksenjek	\$	1,282.32	\$	1,282.32		complete	FTP	
20160335	8/9/16	Rep. Roberto Alonzo	\$	102.37	\$	102.37		complete	FTP	
20160336	8/10/16	John DeStefano - Chester Bedell	\$	1,332.76	\$	1,332.76		complete	FTP	
20160337	8/12/16	John Andersen		see 20160337		see 20160337		see 20160337	complete	FTP
20160338	8/12/16	John Andersen	\$	1,544.22	\$	1,544.22		complete	FTP	
20160339	8/15/16	Rebecca Berry		see 20160340		see 20160340		see 20160340	complete	
20160340	8/15/16	Rebecca Berry	\$	1,565.85	\$	1,565.85		complete	cd	
20160341	8/15/16	Carly McQuarrie - Mathew Parker		see 20160342		see 20160342		see 20160342	complete	
20160342	8/15/16	Carly McQuarrie - Mathew Parker	\$	1,555.15	\$	1,555.15		complete	FTP	
20160343	8/3/16	Congressman Lamar Smith	\$	95.78	\$	95.78		complete	FTP	
20160344	8/15/16	Danielle Gaskins - Dan Buttrey		see 20160345		see 20160345		see 20160345	complete	
20160345	8/15/16	Danielle Gaskins - Dan Buttrey	\$	1,299.06	\$	1,299.06		complete	cd	
20160346	8/19/16	Zach wellwerts	\$	1,252.29	\$	1,252.29		complete	FTP	

20160347	8/25/16		Congressman Ted Poe	\$ 98.19	\$ 98.19		complete	email	
20160348	9/1/16		Alicia Pierce - INTERNAL REQUEST FOR ESTIMATE						
20160349	8/16/16		Sen. Don Huffines	\$ 110.03	\$ 110.03		complete	Paying with credit card. CD.	Arrived at my desk on 9/2/16
20160350	9/2/16		Rep. Paul Workman - DISREGARD	DISREGARD	DISREGARD	DISREGARD	DISREGARD	DISREGARD	DISREGARD
20170000	9/2/16		Rep. Paul Workman	\$ 128.24	\$128.24	\$0.00	complete	PRIMARY 2014 & 2016. TRAVIS, SEVERAL PRECINCTS, DISTRICT 47. ACTIVE ONLY, ONLY TX MAILING ADDRESS	FTP
20170001	Date		John Witson - Disregard	DISREGARD	DISREGARD	DISREGARD	DISREGARD	DISREGARD	DISREGARD
20170002	9/8/16		Eric Opiela	\$ 141.83	\$141.83	\$0.00	complete	VD - HD 120	
20170003	9/7/16		Congressman Lamar Smith	\$ 95.96	\$95.96	\$0.00	complete	VD: LIST OF ONLY VOTERS WITH TX MAILING ADDRESS, WITH EDR 8/1/16 -8/31/16, ONLY ACTIVE VOTERS. US DISTRICT 21 ( BANDERA, BEXAR, BLANCO, COMAL, GILLESPIE, HAYS, KENDALL, KERR, REAL AND TRAVIS)	Email
20170004	9/7/16		Scott G. Wilkinson/AlphaVu LLC	see 2017004	see 2017004	see 2017004	see 2017004	VD: LIST OF VOTERS, ACTIVE AND SUSPENSE, HISPANIC SURNAME FLAGGED FOR COUNTIES: COLLIN, DALLAS, DENTON, ELLIS, KAUFMAN, ROCKWALL, TARRANT.	CD
20170005	9/7/16		Scott G. Wilkinson/AlphaVu LLC	\$ 897.64	\$908.64	\$11.00	complete	VH: LIST OF VOTERS, ACTIVE AND SUSPENSE, HISPANIC SURNAME FLAGGED FOR COUNTIES: COLLIN, DALLAS, DENTON, ELLIS, KAUFMAN, ROCKWALL, TARRANT, WHO VOTED IN THE PRIMARY AND GENERAL ELECTIONS 2008 TILL PRESENT.	CD
20170006	9/9/16		Rep. E Johnson	\$ 128.91	\$128.91	\$0.00	complete	VD. TX MAILING ADDRESS, ACTIVE ONLY, HD 100, DALLAS.	FTP
20170007	9/9/16		Daniel Ball	see 20170008	see 20170008	see 20170008	see 20170008	VD - LIST OF VOTERS, ACTIVE AND SUSPENSE, STATEWIDE, HISPANIC SURNAME FLAGGED.	FTP
20170008	9/9/16		Daniel Ball	\$ 1,466.55	\$1,466.55	\$0.00	complete	VH - LIST OF VOTERS, ACTIVE AND SUSPENSE, WHO VOTED IN THE 2016 PRIMARIES AND 2016 PRIMARY RUNOFFS. BOTH DEM & REP, STATEWIDE, HISPANIC SURNAME FLAGGED.	FTP
20170009	9/15/16		Danielle Gaskins - Dan Buttrey - ESTIMATE to PURCHASE	\$ 1,255.89	\$1,266.89	\$11.00	complete	VD: LIST OF VOTERS, ACTIVE AND SUSPENSE VOTERS, STATEWIDE.	CD
20170010	9/19/16		John Destefano - Judson	see 20170011	see 20170011	see 20170011	see 20170011	VD: LIST OF VOTERS, ACTIVE SUSPENSE AND CANCELLED VOTERS, STATEWIDE.	FTP
20170011	9/19/16		John Destefano - Judson	\$ 1,740.79	\$1,740.79	\$0.00	complete	VH: LIST OF VOTERS, ACTIVE SUSPENSE AND CANCELLED VOTERS, STATEWIDE, WHO VOTED IN THE 2016 PRIMARY RUNOFFS, 2016 HD 139, 2016 PRIMARY, 2016 HD 118 RUNOFF, 2015 CONST.AMENDMENT NOV ELECTION.	FTP
20170012	9/19/16		Carolyn Lehmann - Wishlistdata	\$ 403.76	\$403.76	\$0.00	complete	VD - LIST OF VOTERS, ACTIVE AND SUSPENSE, WITH EDR 1/13/16 UNTIL PRESENT, HISPANIC SURNAME FLAGGED, STATEWIDE.	FTP
20170013	9/21/16		City of Arlington - David Preciado	\$ 380.02	\$391.02	\$11.00	complete	LIST OF ONLY VOTERS WITH TX MAILING ADDRESS, ONLY ACTIVE VOTERS, TARRANT COUNTY.	CD
20170014	9/23/16		Jeff Smith - Opinion Analysts	\$ 306.54	\$317.54	\$11.00	complete	VD - LIST OF VOTERS, ACTIVE AND SUSPENSE, WITH EDR SINCE 8/1/16, STATEWIDE, HISPANIC SURNAME FLAGGED.	CD
20170015	9/26/16		Derek Ryan	\$ 327.34	\$338.34	\$11.00	complete	LIST OF VOTERS, ACTIVE AND SUSPENSE STATUS, WITH EDR SINCE 7/1/16. HISPANIC SURNAME FLAGGED, STATEWIDE.	CD
20170016	9/27/16		carolyn lehmann	\$ 341.88	\$341.88	\$0.00	complete	VH - LIST OF VOTERS, ACTIVE & SUSPENSE, STATEWIDE, WHO VOTED IN THE MAY 2016 RUNOFF ELECTIONS.	FTP
20170017	9/28/16		Renea Hicks	DISREGARD	DISREGARD	DISREGARD	DISREGARD	DISREGARD	DISREGARD
20170018	9/28/16		Renea Hicks	\$ 1,436.03	\$1,447.03	\$11.00	complete	VH: LIST OF VOTERS, ACTIVE AND SUSPENSE, STATEWIDE, HISPANIC SURNAME FLAGGED. VOTERS WHO VOTED IN THE 2012 AND 2014 ELECTIONS ( BOTH REP AND DEM).	CD
20170019	10/7/16		Rep. Byron Cook	\$ 98.74	\$98.74	\$0.00	complete	VH - LIST OF VOTERS WITH ONLY VOTERS WITH TX MAILING ADDRESS, ONLY ACTIVE VOTERS, 2015 GENERAL, COUNTIES: ANDERSON, FREESTONE, HILL & NAVARRO.	FTP
20170021	10/12/16		Rep. Paul Workman	\$ 97.34	\$97.34	\$0.00	complete	VH - LIST OF ONLY VOTERS WITH TX MAILING ADDRESS WHO VOTED IN THE 2016 PRIMARY ELECTIONS, ONLY ACTIVE STATUS, TRAVIS COUNTY, SEVERAL PRECINCTS.	FTP
20170022	10/16/16		Senator Don Huffines - Paying with Credit Card	\$ 97.34	\$108.34	\$11.00	complete	VD - LIST OF ONLY VOTERS WITH TEXAS MAILING ADDRESS, ONLY ACTIVE VOTERS, PRECINCTS AS PER ATTACHMENT IN DALLAS COUNTY.	CD
20170023	10/18/16		Derek Ryan	\$ 324.90	\$335.90	\$11.00	complete	LIST OF VOTERS, ACTIVE AND SUSPENSE STATUS, WITH EDR SINCE 9/26/16. HISPANIC SURNAME FLAGGED, STATEWIDE.	CD
20170024	10/18/16		Rep. Tom Craddick	\$ 135.99	\$135.99	\$0.00	complete	VD - LIST OF ONLY VOTERS WITH TX MAILING ADDRESS, ONLY ACTIVE VOTERS, MIDLAND-MARTIN-DAWSON-UPTON-CRANE COUNTIES	FTP
20170025	10/18/16		Ekaterina Ksenjek	see 20170026	see 20170026	see 20170026	complete	VD: LIST OF VOTERS, IN ACTIVE AND SUSPENSE STATUS, STATEWIDE.	FTP
20170026	10/18/16		Ekaterina Ksenjek	\$ 1,273.36	\$1,273.36	\$0.00	complete	VH: LIST OF VOTERS WHO VOTED IN THE 8/2/16 SPECIAL RUNOFF HD 120, ACTIVE AND SUSPENSE,	FTP
20170027	11/4/16		Congressman Ted Poe	\$ 99.56	\$99.56	\$0.00	complete	VD: LIST OF VOTERS WITH TEXAS MAILING ADDRESS, ONLY ACTIVE VOTERS, WITH EDRs 09/01/16 - 10/31/16, HARRIS COUNTY, US CONGRESS DISTRICT # 2	Email
20170028	11/7/16		John Destefano - Courtney Mullen	withdrawn		withdrawn	withdrawn	withdrawn	withdrawn
20170029	11/7/16		John Destefano - Courtney Mullen	withdrawn		withdrawn	withdrawn	withdrawn	withdrawn

20170030	11/7/16	John Destefano - Courtney Mullen	withdrawn			withdrawn	withdrawn	withdrawn	withdrawn
20170031	11/7/16	John Destefano - Courtney Mullen	withdrawn			withdrawn	withdrawn	withdrawn	withdrawn
20170032	11/7/16	John Destefano - Courtney Mullen	withdrawn			withdrawn	withdrawn	withdrawn	withdrawn
20170033	11/7/16	John Destefano - Courtney Mullen	withdrawn			withdrawn	withdrawn	withdrawn	withdrawn
20170034	11/7/16	John Destefano - Courtney Mullen	withdrawn			withdrawn	withdrawn	withdrawn	withdrawn
20170035	11/17/16	Jeff Smith - Opinion Analysts	\$ 1,279.58	\$1,290.58	\$11.00	complete	VD: List of Voters, in active and suspense status, statewide, Hispanic Surname Flagged.	CD	
20170036	11/18/16	Jeff Morris	\$ 1,174.79	\$1,174.79	\$0.00	complete	VD: LIST OF ONLY VOTERS WITH TX MAILING ADDRESS, ONLY ACTIVE STATUS, STATEWIDE.	FTP	
20170037	11/22/16	Senator Bettencourt	\$ 321.03	\$321.03	\$0.00	complete	VD - LIST OF ONLY VOTERS WITH TEXAS MAILING ADDRESS, ONLY ACTIVE STATUS, SENATE DISTRICT 7.	FTP	
20170038	11/22/16	Senator Troy Fraser	\$ 314.66	\$314.66	\$0.00	complete	VD - LIST OF ONLY VOTERS WITH TEXAS MAILING ADDRESS, ONLY ACTIVE STATUS, SENATE DISTRICT 24.	FTP	
20170039	12/7/16	Scott Davis	\$ 811.54	\$822.54	\$11.00	complete	VD - List of voters, only in active status, several counties.	CD	
20170040	12/7/16	John Andersen	\$ 468.92	\$468.92	\$0.00	complete	VD - List of Registered Voters, active and suspense status, Harris County, Hispanic Surname Flagged.	FTP	
20170041	12/8/16	Aparna Zalani - CBS - ESTIMATE	ESTIMATE	ESTIMATE	ESTIMATE	ESTIMATE	VOTING HISTORY: GENERAL ELECTION 2012 & 2016 (TARRANT, DENTON, DALLAS, & COLLIN). ACTIVE, SUSPENSE AND CANCELLED. HISPANIC SURNAME FLAGGED	ESTIMATE	
20170042	12/8/16	Jeff Smith - Opinion Analysts-waiting until 12/15 to run	\$ 598.89	\$609.89	\$11.00	complete	Voting History File:2016 Nov 8 <sup>th</sup> 2016, active & suspense, Hispanic surname flagged, several counties as per PIR request.	CD	
20170043	12/12/16	Derek Ryan	\$ 717.65	\$728.65	\$11.00	complete	Voting History File: Statewide, General Election Nov 8 <sup>th</sup> 2016, Active & Suspense status, Hispanic Surname Flagged.	CD	
20170044	12/8/16	Aparna Zalani - CBS - 2ND ESTIMATE	ESTIMATE	ESTIMATE	ESTIMATE	ESTIMATE	VOTING HISTORY: GENERAL ELECTION 2012 & 2016 (TARRANT, DALLAS). ACTIVE, SUSPENSE AND CANCELLED. HISPANIC SURNAME FLAGGED	ESTIMATE	
20170045	12/13/16	Rep. Lyle Larson	\$ 235.87	\$235.87	\$0.00	complete	2014 AND 2016 PRIMARIES & GENERAL ONLY VOTERS WITH TX MAILING ADDRESS ONLY ACTIVE VOTERS BEXAR COUNTY HD 122	FTP	
20170046	12/14/16	Congressman Lamar Smith	\$ 111.38	\$111.38	\$0.00	complete	VD: LIST OF ONLY VOTERS WITH TX MAILING ADDRESS, WITH EDR 9/1/16 -11/30/16, ONLY ACTIVE VOTERS. US DISTRICT 21 ( BANDERA, BEXAR, BLANCO, COMAL, GILLESPIE, HAYS, KENDALL, KERR, REAL AND TRAVIS)	Email	
20170047	12/15/16	Lauren Cottingham	\$ 125.24	\$125.24	\$0.00	complete	VH: LIST OF VOTERS WHO VOTED IN THE 2016 GENERAL ELECTION, HD 23, VOTERS IN ACTIVE AND SUSPENSE STATUS, CHAMBERS & GALVESTON COUNTIES ONLY.	FTP	
20170048	12/20/16	Zachary Welwerts-murphynasica	SEE PIR# 20170049	SEE PIR# 20170049	SEE PIR# 20170049	complete	VD: LIST OF REGISTERED VOTERS, STATEWIDE, ACTIVE-SUSPENSE-CANCELLED, HISPANIC SURNAME FLAGGED.	FTP	
20170049	12/20/16	Zachary Welwerts-murphynasica	\$ 1,940.07	\$1,940.07	\$0.00	complete	VH: LIST OF REGISTERED VOTERS, STATEWIDE, ACTIVE-SUSPENSE-CANCELLED, HISPANIC SURNAME FLAGGED, WHO VOTED IN THE 2016 NOV GENERAL ELECTION.	FTP	
20170050	12/27/16	Rep. Jessica Farrar	\$ 118.58	\$118.58	\$0.00	complete	Voting History: 2016 Nov General Elections.	FTP	
20170051	12/27/16	Adam Moschcatel - NationBuilder	SEE PIR# 20170052	SEE PIR# 20170052	SEE PIR# 20170052	complete	VD - LIST OF REGISTERED VOTERS, ACTIVE SUSPENSE AND CANCELLED STATUS, STATEWIDE	FTP	
20170052	12/27/16	Adam Moschcatel - NationBuilder	\$ 1,940.03	\$1,940.03	\$0.00	complete	VH- LIST OF REGISTERED VOTERS, ACTIVE SUSPENSE AND CANCELLED STATUS, STATEWIDE, WHO VOTED IN THE 2016 NOV GENERAL ELECTION.	FTP	
20170053	12/29/16	Carolyn Lehmann - Wishlistdata	SEE PIR# 20170061	SEE PIR# 20170061	SEE PIR# 20170061	complete	V H: LIST OF VOTERS, ACTIVE AND SUSPENSE, STATEWIDE, NOV 2015 CONST. AMENDMENT AND SPEC ELECTION FOR HD 118	FTP	
20170054	1/11/17	Charles Mcarty	No Charge State Agency	No Charge State Agency	No Charge State Agency	complete		FTP	
20170055	1/3/17	John Doner	SEE PIR# 20170059	SEE PIR# 20170059	SEE PIR# 20170059	complete	VD: LIST OF VOTERS, ACTIVE AND SUSPENSE, STATEWIDE, HISPANIC SURNAME FLAGGED.	FTP	
20170056	1/3/17	John Doner	SEE PIR# 20170059	SEE PIR# 20170059	SEE PIR# 20170059	complete	VH: LIST OF VOTERS, WHO VOTED IN THE 2012 ELECTIONS, ACTIVE AND SUSPENSE, HISPANIC SURNAME FLAGGED.	FTP	
20170057	1/3/17	John Doner	SEE PIR# 20170059	SEE PIR# 20170059	SEE PIR# 20170059	complete	VH: LIST OF VOTERS, WHO VOTED IN THE 2013 AND 2014 ELECTIONS, ACTIVE AND SUSPENSE, STATEWIDE, HISPANIC SURNAME FLAGGED.	FTP	
20170058	1/3/17	John Doner	SEE PIR# 20170059	SEE PIR# 20170059	SEE PIR# 20170059	complete	VH: LIST OF VOTERS, WHO VOTED IN THE 2015 ELECTIONS, ACTIVE AND SUSPENSE, HISPANIC SURNAME FLAGGED.	FTP	
20170059	1/3/17	John Doner	\$ 3,293.25	\$3,304.25	\$11.00	complete	VH: LIST OF VOTERS, WHO VOTED IN THE 2016 ELECTIONS, ACTIVE AND SUSPENSE, HISPANIC SURNAME FLAGGED.	FTP	
20170060	12/29/16	Carolyn Lehmann - Wishlistdata	SEE PIR# 20170061	SEE PIR# 20170061	SEE PIR# 20170061	complete	V H: LIST OF VOTERS, ACTIVE AND SUSPENSE, STATEWIDE, 2016 ALL ELECTIONS FOR HD: 118,120,139 2016 NOV 8 GENERAL	FTP	
20170061	12/29/16	Carolyn Lehmann - Wishlistdata	\$ 1,053.74	\$1,053.74	\$0.00	complete	VD: LIST OF VOTERS, ACTIVE AND SUSPENSE, STATEWIDE, WITH EDR 9/15/16 FORWARD.	FTP	
20170062	1/11/17	James Barnes	\$ 904.65	\$904.65	\$0.00	Complete	VH for Active, Suspense & Canceled Status Statewide 2016 November 8th GE	FTP	
20170063	1/12/17	Rep. Oscar Longoria - Paying with Credit Card-Not from House Reproductions	\$ 112.07	\$112.07	\$0.00	Complete	VH for HD 35 Cameron & Hidalgo Counties 2016 November 8th GE	FTP	
20170064	1/12/17	John DeStefano	\$ 6,085.48	\$6,096.48	\$11.00	Complete	VD statewide and VH for all elections from 1996-2016	CD	
20170065	1/12/17	John DeStefano	See PIR 20170064			0-Jan-00	VD statewide and VH for all elections from 1996-2016	CD	

20170066	1/12/17	John DeStefano	See PIR 20170064				0-Jan-00	VD statewide and VH for all elections from 1996-2016	CD
20170067	1/12/17	John DeStefano	See PIR 20170064				0-Jan-00	VD statewide and VH for all elections from 1996-2016	CD
20170068	1/12/17	John DeStefano	See PIR 20170064				0-Jan-00	VD statewide and VH for all elections from 1996-2016	CD
20170069	1/12/17	John DeStefano	See PIR 20170064				0-Jan-00	VD statewide and VH for all elections from 1996-2016	CD
20170070	1/12/17	John DeStefano	See PIR 20170064				0-Jan-00	VD statewide and VH for all elections from 1996-2016	CD
20170071	1/12/17	John DeStefano	See PIR 20170064				0-Jan-00	VD statewide and VH for all elections from 1996-2016	CD
20170072	1/13/17	Ronnie Young	\$ 678.41	\$689.41	\$11.00		Complete	VH for all counties except Dallas, Tarrant, Collin, Denton & Harris. 2016 November 8th GE Active & Suspense	CD
20170073	1/17/17	Jeff Smith	\$ 296.00	\$296.00		Paid check 16604 221.00 & check 16583 75.00	Complete	VH 2016 November 8th GE Active & Suspense for Floyd, Hale, Hidalgo, Medina, Midland, Mitchell, Motley, Presidio, Titus, Webb, Willacy, Zapata	CD
20170074	1/17/17	Ekaterina Ksenjek	\$ 1,822.01	\$1,822.01	\$0.00		Complete	VD Statewide Active & Suspense	FTP
20170075	1/17/17	Ekaterina Ksenjek	See PIR 20170075	See PIR 20170075			Complete	VH Active & Suspense 2016 November 8th GE.	FTP
20170076	1/20/17	Voter Trove - Justin Gargiulo	\$892.70	\$903.70	\$11.00		Complete	VH Active & Suspense 2016 November 8th GE.	CD
20170077	1/18/17	Patrick Bainter	\$1,940.25	\$1,940.25	\$0.00		Complete	VD Statewide Active, Suspense, Canceled with Hispanic Surname Flagged	FTP
20170078	1/18/17	Patrick Bainter	See PIR 2017077	See PIR 2017077			Complete	VH for Active, Suspense & Canceled Status Statewide 2016 November 8th GE with Hispanic Flagged.	FTP
20170079	1/23/17	Leland Beatty	\$ 2,830.29	\$2,830.29		Paid check 0106 \$75.00Deposit Paid check 0000201035 \$2,755.29	Complete	VD Statewide Active, Suspense, Canceled with Hispanic Surname Flagged	CD
20170080	1/23/17	Leland Beatty	See PIR 2017079	See PIR 2017079	See PIR 2017079		Complete	VH Statewide Active, Suspense Canceled 2016 November 8th GE, Both Primaries and Both Runoffs	CD
20170081	1/23/17	Leland Beatty	See PIR 2017079	See PIR 2017079	See PIR 2017079		Complete	VH Statewide Active, Suspense Canceled 2014 November GE, Both Primaries and Both Runoffs & 2015 Const. Amendment	CD
20170082	1/25/17	Claudia Hogue	\$ 799.29	\$810.29	\$11.00		Complete	VD for Bexar, Cameron, Harris, Hidalgo, Starr & Willacy - all Active, Suspense & Canceled voters.	CD
20170083	1/25/17	Claudia Hogue	See PIR 20170082	See PIR 20170082	See PIR 20170082		Complete	VHfor Bexar, Cameron, Harris, Hidalgo, Starr & Willacy - all Active, Suspense & Canceled voters for 2016 Nov. 8th GE, March 1st Primaries (Dem & Rep) and May 24th Primary Runoffs (Dem & Rep).	CD
20170084	1/30/17	Catalist - Christina Feiner	\$ 1,941.12	\$1,941.12	\$0.00		Complete	VH Statewide for November 8th GE for all Active, Suspense and Canceled status.	FTP
20170085	1/30/17	Catalist - Christina Feiner	See PIR 2017084	See PIR 2017084	See PIR 2017085		Complete	VD statewide registered voters for all Active, Susepense and Canceled Status.	FTP
20170086	2/1/17	Matthew Packer - Carly McQuarrie	See PIR# 20170087	See PIR# 20170087	See PIR# 20170087		complete	VH- List of Voters, statewide, in active, suspense and cancelled status, who voted in the 2016 General Election.	FTP
20170087	2/1/17	Matthew Packer - Carly McQuarrie	\$ 1,942.20	\$1,942.20	\$0.00		complete	VD- List of Voters, statewide, in active, suspense and cancelled status.	FTP
20170088	2/2/17	SOUTHERN US DISTRICT COURT-MARRIANNE STILL-DAVID BRADLEY	\$ 609.41	\$620.41	\$11.00		complete	VD: LIST OF VOTERS, 43 COUNTIES, ONLY ACTIVE VOTERS, ONLY VOTERS WITH TEXAS MAILING ADDRESS.	CD
20170089	2/2/17	Mauricio Navarro	\$ 1,253.12	\$1,264.12	\$11.00		complete	VD LIST OF REGISTERED VOTERS, IN ACTIVE & SUSPENSE STATUS, STATEWIDE. CD ROM.	CD
20170090	2/3/17	Congressman Lamar Smith	\$ 97.30	\$97.30	\$0.00		complete	VD: LIST OF ONLY VOTERS WITH TX MAILING ADDRESS, WITH EDR 12/1/2016 - 1/31/2016, ONLY ACTIVE VOTERS. US DISTRICT 21 ( BANDERA, BEXAR, BLANCO, COMAL, GILLESPIE, HAYS, KENDALL, KERR, REAL AND TRAVIS).	Email
20170091	2/6/17	Aya Ibrahim	See PIR# 20170093	See PIR# 20170093	See PIR# 20170093		complete	VH: 2006-2008 GENERAL ELECTIONS, US CONG. DISTRICT 8, ACTIVE AND SUSPENSE, CD ROM.	CD
20170092	2/6/17	Aya Ibrahim	See PIR# 20170093	See PIR# 20170093	See PIR# 20170093		complete	VH: 2010 AND 2012 GENERAL ELECTIONS, US CONG. DISTRICT 8, ACTIVE AND SUSPENSE, CD ROM.	CD
20170093	2/6/17	Aya Ibrahim	\$ 389.99	\$400.99	\$11.00		complete	VH: 2014 AND 2016 GENERAL ELECTIONS, US CONG. DISTRICT 8, ACTIVE AND SUSPENSE, CD ROM.	CD
20170094	2/8/17	Michael Sarver - Assessure Systems	\$ 1,377.34	\$1,388.34	\$11.00		complete	VD : VOTER DATA FILE. LIST OF VOTERS, IN ACTIVE, SUSPENSE AND CANCELLED STATUS, STATEWIDE.	CD
20170095	2/13/17	Market Research Foundation - Raymond Wotring-Shelby Smith	SEE PIR# 20170096	SEE PIR# 20170096	SEE PIR# 20170096		complete	VD : VOTER DATA FILE. LIST OF VOTERS, IN ACTIVE, SUSPENSE AND CANCELLED STATUS, STATEWIDE.	FTP
20170096	2/13/17	Market Research Foundation - Raymond Wotring-Shelby Smith			\$0.00		complete	VH: LIST OF VOTERS, ACTIVE SUSPENSE AND CANCELLED STATUS, STATEWIDE, WHO VOTED IN ALL ELECTIONS AVAILABLE SINCE 2015 UNTIL PRESENT.	FTP
20170097	2/17/17	Bruce Anderson	See PIR# 20170098	See PIR# 20170098	See PIR# 20170098		complete	VD: LIST OF VOTERS IN ACTIVE AND SUSPENSE, HISPANIC SURNAME FLAGGED, STATEWID	FTP
20170098	2/17/17	Bruce Anderson	\$ 1,816.97	\$1,816.97	\$0.00		complete	VH - LIST OF VOTERS WHO VOTED IN THE 2016 NOV GENERAL ELECTION ,ACTIVE AND SUSPENSE, HISPANIC SURNAME FLAGGED, STATEWIDE.	FTP
20170099	2/21/17	Daniel Ichinose	SEE PIR# 20170102	SEE PIR# 20170102	SEE PIR# 20170102		complete	VD LIST OF VOTERS, ACTIVE & SUSPENSE STATUS, STATEWIDE.	CD
20170100	2/21/17	Daniel Ichinose	SEE PIR# 20170103	SEE PIR# 20170102	SEE PIR# 20170102		complete	VH 2012 PRIMARIES MAY 2012 GENERAL NOV	CD
20170101	2/21/17	Daniel Ichinose	SEE PIR# 20170104	SEE PIR# 20170102	SEE PIR# 20170102		complete	VH MARCH PRIMARIES 2014, NOVEMBER GENERAL 2014	CD
20170102	2/21/17	Daniel Ichinose	\$ 3,025.89	\$3,036.89	\$11.00		complete	VH MARCH PRIMARIES 2016, NOVEMBER GENERAL 2016	CD
20170103	3/10/17	Tony Johnson	ESTIMATE	ESTIMATE	ESTIMATE		ESTIMATE	VH 2016 PRIMARY & GENERAL ELECTIONS. ONLY ACTIVE VOTERS, STATEWIDE	ESTIMATE
20170104	3/10/17	Tony Johnson	ESTIMATE	ESTIMATE	ESTIMATE		ESTIMATE	VH 2016 PRIMARY & GENERAL ELECTIONS ACTIVE & SUSPENSE VOTERS STATEWIDE	ESTIMATE

20170105	3/20/17		Richard Ash Wright	See PIR 20170111	See PIR 20170111	See PIR 20170111	complete	VOTER DATA: LIST OF VOTERS, IN ACTIVE AND SUSPENSE STATUS, STATEWIDE, HISPANIC SURNAME FLAGGED.	See PIR 20170111
20170106	3/20/17		Richard Ash Wright	See PIR 20170111	See PIR 20170111	See PIR 20170111	complete	VOTING HISTORY FILE: LIST OF VOTERS, IN ACTIVE AND SUSPENSE STATUS, STATEWIDE, HISPANIC SURNAME FLAGGED, ELECTIONS 1996-1999.	See PIR 20170111
20170107	3/20/17		Richard Ash Wright	See PIR 20170111	See PIR 20170111	See PIR 20170111	complete	VOTING HISTORY FILE: LIST OF VOTERS, IN ACTIVE AND SUSPENSE STATUS, STATEWIDE, HISPANIC SURNAME FLAGGED, ELECTIONS 2000-2004	See PIR 20170111
20170108	3/20/17		Richard Ash Wright	See PIR 20170111	See PIR 20170111	See PIR 20170111	complete	VOTING HISTORY FILE: LIST OF VOTERS, IN ACTIVE AND SUSPENSE STATUS, STATEWIDE, HISPANIC SURNAME FLAGGED, ELECTIONS 2005-2008	See PIR 20170111
20170109	3/20/17		Richard Ash Wright	See PIR 20170111	See PIR 20170111	See PIR 20170111	complete	VOTING HISTORY FILE: LIST OF VOTERS, IN ACTIVE AND SUSPENSE STATUS, STATEWIDE, HISPANIC SURNAME FLAGGED, ELECTIONS 2009-2012	See PIR 20170111
20170110	3/20/17		Richard Ash Wright	See PIR 20170111	See PIR 20170111	See PIR 20170111	complete	VOTING HISTORY FILE: LIST OF VOTERS, IN ACTIVE AND SUSPENSE STATUS, STATEWIDE, HISPANIC SURNAME FLAGGED, ELECTIONS 2013-2015	See PIR 20170111
20170111	3/20/17		Richard Ash Wright	\$ 5,597.90	\$5,608.90	\$11.00	complete	VOTING HISTORY FILE: LIST OF VOTERS, IN ACTIVE AND SUSPENSE STATUS, STATEWIDE, HISPANIC SURNAME FLAGGED, ELECTIONS 2016-TO PRESENT.	CD
20170112	Date		Jeff Smith	\$ 858.30	\$869.30	\$11.00	complete	VOTER DATA FILE LIST OF VOTERS, ACTIVE AND SUSPENSE STATUS, HISPANIC SURNAME FLAGGED, ALL COUNTIES EXCEPT: DALLAS, EL PASO, FORT BEND, HARRIS, TARRANT, TRAVIS, WILLIAMSON.	CD
20170113	Date		Reuben Amaron	see PIR 20170119	see PIR 20170119	see PIR 20170119	complete	DIVISION# 1 LIST OF VOTERS, ACTIVE & SUSPENSE, SEVERAL COUNTIES AS PER REQUEST.	CD
20170114	Date		Reuben Amaron	see PIR 20170119	see PIR 20170119	see PIR 20170119	complete	DIVISION#2 LIST OF VOTERS, ACTIVE & SUSPENSE,SEVERAL COUNTIES AS PER REQUEST.	CD
20170115	Date		Reuben Amaron	see PIR 20170119	see PIR 20170119	see PIR 20170119	complete	DIVISION#3 LIST OF VOTERS, ACTIVE & SUSPENSE, SEVERAL COUNTIES AS PER REQUEST.	CD
20170116	Date		Reuben Amaron	see PIR 20170119	see PIR 20170119	see PIR 20170119	complete	DIVISION#4 LIST OF VOTERS, ACTIVE & SUSPENSE, SEVERAL COUNTIES AS PER REQUEST.	CD
20170117	Date		Reuben Amaron	see PIR 20170119	see PIR 20170119	see PIR 20170119	complete	DIVISION# 5 LIST OF VOTERS, ACTIVE & SUSPENSE STATUS, SEVERAL COUNTIES AS SPECIFIED IN PIR.	CD
20170118	Date		Reuben Amaron	see PIR 20170119	see PIR 20170119	see PIR 20170119	complete	DIVISION#6 LIST OF VOTERS, ACTIVE & SUSPENSE, SEVERAL COUNTIES AS PER PIR.	CD
20170119	Date		Reuben Amaron	\$ 574.04	\$651.04	\$77.00	complete	DIVISION#7 LIST OF VOTERS, ACTIVE & SUSPENSE STATUS, SEVERAL COUNTIES AS PER PIR.	CD
20170120	Date		Steven Ochoa - MALDEF	see PIR 20170121	see PIR 20170121	see PIR 20170121	complete	ESTIMATE: VOTING HISTORY LIST OF VOTERS, ACTIVE AND SUSPENSE, WHO VOTED IN THE 2016 NOV. 8 GENERAL ELECTION, 2016 PRIMARY MARCH ELECTION (DEM & REP), STATEWIDE, HISPANIC SURNAME FLAGGED.	see PIR 20170121
20170121	Date		Steven Ochoa - MALDEF	\$ 2,081.65	\$2,081.65	\$0.00	complete	ESTIMATE: VOTER DATA FILE. LIST OF VOTERS, ACTIVE AND SUSPENSE, STATEWIDE, HISPANIC SURNAME FLAGGED.	FTP
20170122	3/22/2017 4/6/17		Northern District of Texas - Anne Brabham	\$ 567.67	\$578.67	\$11.00	complete	VD FILE. LIST OF VOTERS, ACTIVE AND SUSPENSE STATUS, 100 COUNTIES AS SPECIFIED IN THE REQUEST.	CD
20170123	3/24/17		Kenneth J. Block	\$ 2,217.44	\$2,228.44	\$11.00	complete	VOTING HISTORY: LIST OF VOTERS IN ACTIVE AND SUSPENSE STATUS, WHO VOTED IN THE GENERAL ELECTIONS OF 2008,2010,2012,2014,2016, STATEWIDE.	CD
20170124	3/29/17		Steven Ochoa - MALDEF	ESTIMATE	ESTIMATE	ESTIMATE	ESTIMATE	ESTIMATE: GENERAL 2016	ESTIMATE
20170125	3/29/17		Steven Ochoa - MALDEF	ESTIMATE	ESTIMATE	ESTIMATE	ESTIMATE	ESTIMATE: PRIMARY MARCH (REP) 2016	ESTIMATE
20170126	3/29/17		Steven Ochoa - MALDEF	ESTIMATE	ESTIMATE	ESTIMATE	ESTIMATE	ESTIMATE: PRIMARY DEM 2016	ESTIMATE
20170127	3/29/17		Rebecca Berry	See PIR 20170128	See PIR 20170128	See PIR 20170128	complete	VOTER DATA FILE: LIST OF VOTERS IN ACTIVE & SUSPENSE STATUS WITH EDR 9/19/2016 UNTIL PRESENT, STATEWIDE.	See PIR 20170128
20170128	3/29/17		Rebecca Berry	\$ 961.11	\$972.11	\$11.00	complete	VOTING HISTORY FILE: * LIST OF VOTERS, IN ACTIVE & SUSPENSE STATUS, WHO VOTED IN THE NOV 8, 2016 ELECTION, STATEWIDE.	CD
20170129	4/3/17		Claire Grady	ESTIMATE	ESTIMATE	ESTIMATE	ESTIMATE	ESTIMATE VOTING HISTORY 2014 GENERAL ELECTION, 2015 CONST. AMEND. ACTIVE & SUSPENSE VOTERS US DISTRICTS: 28,35,134,24,57,109,52,98,48	ESTIMATE
20170130	4/5/17		Congressman Lamar Smith	\$ 96.03	\$96.03	\$0.00	complete	VD: LIST OF ONLY VOTERS WITH TX MAILING ADDRESS, WITH EDR 02/01/2017 AND 03/31/207, ONLY ACTIVE VOTERS. US DISTRICT 21 ( BANDERA, BEXAR, BLANCO, COMAL, GILLESPIE, HAYS, KENDALL, KERR, REAL AND TRAVIS).	FTP
20170131	4/7/17		John Andersen	\$ 427.04	\$427.04	\$0.00	complete	LIST OF REGISTERED VOTERS, ACTIVE & SUSPENSE STATUS, WHO VOTED IN THE NOVEMBER 2015 CONSTITUTIONAL AMENDMENT ELECTION, STATEWIDE, HISPANIC SURNAME FLAGGED.	FTP
20170132	4/10/17		Congressman Ted Poe	\$ 101.81	\$101.81	\$0.00	complete	VD: LIST OF VOTERS WITH TEXAS MAILING ADDRESS, ONLY ACTIVE VOTERS, WITH EDRS 11/01/16 - 03/31/17, HARRIS COUNTY, US CONGRESS DISTRICT # 2	FTP
20170133	4/13/17		Ji Su Yoo - Harvard University	See PIR# 20170137	See PIR# 20170137	See PIR# 20170137	complete	VD: LIST OF VOTERS IN ACTIVE, SUSPENSE AND CANCELLED STATUS, STATEWIDE, HISPANIC SURNAME FLAGGED.	See PIR# 20170137

20170134	4/13/17		Ekaterina Ksenjek	\$ 1,258.14	\$1,258.14	\$0.00	complete	VD: LIST OF VOTERS IN ACTIVE AND SUSPENSE STATUS, STATEWIDE.	FTP
20170135	4/18/17		Matthew Lakin	See PIR# 20170136	See PIR# 20170136	See PIR# 20170136	complete	VD: LIST OF VOTERS IN ACTIVE, SUSPENSE AND CANCELLED STATUS, STATEWIDE.	See PIR# 20170136
20170136	4/18/17		Matthew Lakin	\$ 2,352.51	\$2,352.51	\$0.00	complete	VH: LIST OF VOTERS IN ACTIVE, SUSPENSE AND CANCELLED STATUS, STATEWIDE, WHO VOTED IN THE FOLLOWING ELECTIONS: 2016 NOV GENERAL ELECTION, 2016 PRIMARY RUNOFFS, 2016 MARCH PRIMARIES, 2015 NOV CONSTITUTIONAL AMENDMENT.	FTP
20170137	4/13/17		Ji Su Yoo - Harvard University	\$ 2,929.19	\$2,929.19	\$0.00	complete	VH: LIST OF VOTERS IN ACTIVE, SUSPENSE AND CANCELLED STATUS, STATEWIDE, HISPANIC SURNAME FLAGGED, WHO VOTED IN ALL ELECTIONS 2012 & 2016.	FTP
20170138	4/25/17		Claire Grady	see PIR# 20170151	see PIR# 20170151	see PIR# 20170151	complete	VH ACTIVE & SUSPENSE 2014 GENERAL 2015 CONSTITUTIONAL HD# 28,35,134,24,57,109,52,98,48	see PIR# 20170151
20170139	4/25/17		Claire Grady	see PIR# 20170151	see PIR# 20170151	see PIR# 20170151	complete	VD FILE: LIST OF VOTERS IN ACTIVE & SUSPENSE STATUS, SENATE DISTRICTS: 9,30, 5. (COUNTIES SPECIFIED IN REQUEST)	see PIR# 20170151
20170140	4/25/17		Claire Grady	see PIR# 20170151	see PIR# 20170151	see PIR# 20170151	complete	VD: LIST OF VOTERS IN ACTIVE & SUSPENSE STATUS, SENATE DISTRICT 4, 25. COUNTIES SPECIFIED IN REQUEST.	see PIR# 20170151
20170141	4/25/17		Claire Grady	see PIR# 20170151	see PIR# 20170151	see PIR# 20170151	complete	VD: LIST OF VOTERS ACTIVE & SUSPENSE, SENATE DISTRICT # 2. COUNTIES SPECIFIED IN REQUEST.	see PIR# 20170151
20170142	4/25/17		Claire Grady	see PIR# 20170151	see PIR# 20170151	see PIR# 20170151	complete	VD LIST OF VOTERS, ACTIVE & SUSPENSE, SENATE DISTRICT # 11.	see PIR# 20170151
20170143	4/25/17		Claire Grady	see PIR# 20170151	see PIR# 20170151	see PIR# 20170151	complete	VD VOTERS LIST, ACTIVE & SUSPENSE, SENATE DISTRICT # 15.	see PIR# 20170151
20170144	4/25/17		Claire Grady	see PIR# 20170151	see PIR# 20170151	see PIR# 20170151	complete	VD LIST OF VOTERS, ACTIVE & SUSPENSE STATUS, SENATE DISTRICT # 21	see PIR# 20170151
20170145	4/25/17		Claire Grady	see PIR# 20170151	see PIR# 20170151	see PIR# 20170151	complete	VD LIST OF VOTERS, ACTIVE & SUSPENSE STATUS, HOUSE DISTRICT# 111	see PIR# 20170151
20170146	4/25/17		Claire Grady	see PIR# 20170151	see PIR# 20170151	see PIR# 20170151	complete	VD LIST OF VOTERS, ACTIVE & SUSPENSE STATUS, HOUSE DISTRICT # 100	see PIR# 20170151
20170147	4/25/17		Claire Grady	see PIR# 20170151	see PIR# 20170151	see PIR# 20170151	complete	VD LIST OF VOTERS, ACTIVE & SUSPENSE STATUS, HOUSE DISTRICT # 133	see PIR# 20170151
20170148	4/25/17		Claire Grady	see PIR# 20170151	see PIR# 20170151	see PIR# 20170151	complete	VD LIST OF VOTERS, ACTIVE & SUSPENSE, HOUSE DISTRICT# 141	see PIR# 20170151
20170149	4/25/17		Claire Grady	see PIR# 20170151	see PIR# 20170151	see PIR# 20170151	complete	VD LIST OF VOTERS, ACTIVE & SUSPENSE, HOUSE DISTRICT# 138	see PIR# 20170151
20170150	4/25/17		Claire Grady	see PIR# 20170151	see PIR# 20170151	see PIR# 20170151	complete	VD LIST OF VOTERS, ACTIVE & SUSPENSE, HOUSE DISTRICT# 44, 9, 72, 53, 42, 55, 68, 85. COUNTIES SPECIFIED ON REQUEST.	see PIR# 20170151
20170151	4/25/17		Claire Grady	\$ 723.06	\$734.06	\$11.00	Complete	VD. HALL COUNTY. HD AS REQUEST. ACTIVE & SUSPENSE.	CD
20170152	4/24/17		Jim Harrold	\$ 1,184.30	\$1,184.30	\$0.00	complete	VD LIST OF REGISTERED VOTERS, IN ACTIVE & SUSPENSE STATUS, STATEWIDE.	FTP
20170153	4/27/17		Jackie W. Rice	See PIR# 20170158	See PIR# 20170158	See PIR# 20170158	complete	VH: LIST OF VOTERS IN ACTIVE, SUSPENSE AND CANCELLED STATUS, WHO VOTED IN ALL THE AVAILABLE ELECTIONS FROM 1997-1999, LIBERTY COUNTY.	See PIR# 20170158
20170154	4/27/17		Jackie W. Rice	See PIR# 20170158	See PIR# 20170158	See PIR# 20170158	complete	VH: LIST OF VOTERS IN ACTIVE, SUSPENSE AND CANCELLED STATUS, WHO VOTED IN ALL THE AVAILABLE ELECTIONS FROM 2000-2003, LIBERTY COUNTY.	See PIR# 20170158
20170155	4/27/17		Jackie W. Rice	See PIR# 20170158	See PIR# 20170158	See PIR# 20170158	complete	VH ACTIVE,SUSPENSE,CANCELLED LIBERTY COUNTY 2004-2007	See PIR# 20170158
20170156	4/27/17		Jackie W. Rice	See PIR# 20170158	See PIR# 20170158	See PIR# 20170158	complete	VH: LIST OF VOTERS IN ACTIVE, SUSPENSE AND CANCELLED STATUS, WHO VOTED IN ALL THE AVAILABLE ELECTIONS FROM 2008-2010, LIBERTY COUNTY.	See PIR# 20170158
20170157	4/27/17		Jackie W. Rice	See PIR# 20170158	See PIR# 20170158	See PIR# 20170158	complete	VH: LIST OF VOTERS IN ACTIVE, SUSPENSE AND CANCELLED STATUS, WHO VOTED IN ALL THE AVAILABLE ELECTIONS FROM 2011-2014, LIBERTY COUNTY.	See PIR# 20170158
20170158	4/27/17		Jackie W. Rice	\$ 246.96	\$246.96	\$0.00	complete	VH: LIST OF VOTERS IN ACTIVE, SUSPENSE AND CANCELLED STATUS, WHO VOTED IN ALL THE AVAILABLE ELECTIONS FROM 2015-2016, LIBERTY COUNTY.	FTP
20170159	4/27/17		Melanie Ostovic - SGS	\$ 1,259.30	\$1,259.30	\$0.00	complete	VD LIST OF VOTERS IN ACTIVE AND SUSPENSE STATUS, STATEWIDE, HISPANIC SURNAME FLAGGED.	FTP
20170160	5/1/17		Richard Andro - Impactinfo, Inc.	\$ 1,253.54	\$1,264.54	\$11.00	complete	VD LIST OF VOTERS, IN ACTIVE AND SUSPENSE STATUS, WITH ONLY TEXAS MAILING ADDRESS, HISPANIC SURNAME FLAGGED, STATEWIDE.	FTP
20170161	5/15/17		Rep. Richard Pena Raymond - ESTIMATE	ESTIMATE	ESTIMATE	ESTIMATE	ESTIMATE	ESTIMATE: ONLY ACTIVE VOTERS, ONLY VOTERS WITH TX MAILING ADDRESS, 2016 PRIMARY.	
20170162	5/22/17		Rep. Lina Ortega	ESTIMATE	ESTIMATE	ESTIMATE	ESTIMATE	VH AND VD HD 77 ESTIMATE	
20170163	Date		Rep. Lina Ortega	DISREGARD	DISREGARD	DISREGARD	DISREGARD	VH ESTIMATE HD 77	
20170164	Date		Daeron Lockett	\$ 316.80	\$316.80	\$0.00	complete	LIST OF VOTERS, ACTIVE-SUSPENSE-CANCELLED STATUS, CONGRESSIONAL DISTRICT 30	FTP
20170165	Date		Brianna Carmen	\$ -		\$0.00	ESTIMATE	VD ACTIVE AND SUSPENSE VOTERS STATEWIDE	
20170166	Date		Brianna Carmen	\$ -		\$0.00	ESTIMATE	VH ACTIVE AND SUSPENSE STATEWIDE 1996-1999 ELECTIONS	

20170167	Date	Brianna Carmen	\$ -		\$0.00	ESTIMATE	VH ACTIVE AND SUSPENSE STATEWIDE ELECTIONS 2000-2003	
20170168	Date	Brianna Carmen	\$ -		\$0.00	ESTIMATE	VH ACTIVE AND SUSPENSE STATEWIDE ELECTIONS 2004-2006	
20170169	Date	Brianna Carmen	\$ -		\$0.00	ESTIMATE	VH ACTIVE AND SUSPENSE STATEWIDE ELECTIONS 2007-2010	
20170170	Date	Brianna Carmen	\$ -		\$0.00	ESTIMATE	VH ACTIVE AND SUSPENSE VOTERS STATEWIDE ELECTIONS 2011-2013	
20170171	Date	Brianna Carmen	\$ -		\$0.00	ESTIMATE	VH ACTIVE AND SUSPENSE STATEWIDE ELECTIONS 2014-2016	
20170172	Date	Rep. Matt Shaheen		ESTIMATE		ESTIMATE	ESTIMATE	ESTIMATE
20170173	Date	Rep. Phil King		ESTIMATE		ESTIMATE	ESTIMATE	ESTIMATE
20170174	Date	Robert Soza	\$ 96.91	\$107.91	\$11.00	complete	VD LIST OF VOTERS, ACTIVE AND SUSPENSE STATUS, REAGAN AND MITCHELL COUNTIES.	
20170175	Date	Ethan Maxey	\$ -			ESTIMATE	ESTIMATE	
20170176	Date	Dan Buttrey	\$ -			CANCELLED	CANCELLED	
20170177	6/6/17	Scott Wilkinson	\$ 212.19	\$223.19	\$11.00	Complete	Voting History for all A,S, C status who voted in the 2016 Dem & Rep. Primaries - No run-offs for District 8	FTP
20170178	Date	Dan Buttrey	\$ -			CANCELLED	CANCELLED	
20170179	Date	Dan Buttrey	\$ -			CANCELLED	CANCELLED	
20170180	Date	Dan Buttrey	\$ -			CANCELLED	CANCELLED	
20170181	Date	Dan Buttrey	\$ -			CANCELLED	CANCELLED	
20170182	Date	Dan Buttrey	\$ -			CANCELLED	CANCELLED	
20170183	6/7/17	Congressman Lamar Smith	\$ 96.38	\$96.38		complete	Active voters between 4/1/2017 to 5/31/17 in U.S. Congressional District 21 to include the counties of Bandera, Bexar, Blanco, Comal, Gillespie, Hays, Kendall, Kerr, Real and Travis	
20170184	6/9/17	John Pizzo	\$ -			ESTIMATE	VD, STATEWIDE, ACTIVE SUSPENSE & CANCELLED VOTERS.	
20170185	6/9/17	John Pizzo	\$ -			ESTIMATE	VH 2012,2014,2016 STATEWIDE, ACTIVE,SUSPENSE AND CANCELLED VOTERS.	
20170186	6/9/17	John Pizzo	\$ -			ESTIMATE	VH.	
20170187	6/9/17	John Pizzo	\$ -			ESTIMATE	VH, GENERAL ELECTIONS, 2012, 2014, 2016. ACTIVE, SUSPENSE, CANCELLED.	
20170188	6/9/17	Paul Graham	\$ 1,263.61	\$1,263.61		complete	VD VOTERS, ACTIVE AND SUSPENSE, HISPANIC SURNAME FLAGGED, STATEWIDE	
20170189	6/14/17	Dan Buttrey	\$ 1,391.98	\$1,402.98	\$11.00	complete	VD LIST OF VOTERS, IN ACTIVE, SUSPENSE & CANCELLED STATUS, STATEWIDE.	
20170190	6/15/17	Humza Tahir	\$ -			ESTIMATE	VD LIST OF REGISTERED VOTERS, ACTIVE, SUSPENSE AND CANCELLED STATUS, HISPANIC SURNAME FLAGGED, STATEWIDE.	Lindsey Handling
20170191	6/15/17	Humza Tahir	\$ -			ESTIMATE	VH LIST OF REGISTERED VOTERS, IN ACTIVE SUSPENSE AND CANCELLED STATUS, HISPANIC SURNAME FLAGGED, WHO VOTED IN THE ELECTIONS 1996-1998.	Lindsey Handling
20170192	6/15/17	Humza Tahir	\$ -			ESTIMATE	VH LIST OF VOTERS, ACTIVE SUSPENSE AND CANCELLED, HISPANIC SURNAME FLAGGED, STATEWIDE.	Lindsey Handling
20170193	6/15/17	Humza Tahir	\$ -			ESTIMATE	VH LIST OF VOTERS, ACTIVE SUSPENSE CANCELLED, HISPANIC SURNAME FLAGGED, STATEWIDE.2003-2006	Lindsey Handling
20170194	6/15/17	Humza Tahir	\$ -			ESTIMATE	VH LIST OF REGISTERED VOTERS, IN ACTIVE SUSPENSE AND CANCELLED STATUS, HISPANIC SURNAME FLAGGED, STATEWIDE WHO VOTED IN THE ELECTIONS 2007-2010.	Lindsey Handling
20170195	6/15/17	Humza Tahir	\$ -			ESTIMATE	VH LIST OF VOTERS, ACTIVE SUSPENSE AND CANCELLED STATUS, HISPANIC SURNAME FLAGGED, STATEWIDE, WHO VOTED IN THE ELECTIONS 2011-2013.	Lindsey Handling
20170196	6/15/17	Humza Tahir	\$ -			ESTIMATE	VH LIST OF VOTERS IN ACTIVE SUSPENSE CANCELLED STATUS, WHO VOTED IN THE ELECTION 2014-2015, HISPANIC SURNAME FLAGGED, STATEWIDE.	Lindsey Handling
20170197	6/15/17	Humza Tahir	\$ -			ESTIMATE	VH LIST OF VOTERS, ACTIVE SUSPENSE AND CANCELLED STATUS, HISPANIC SURNAME FLAGGED, WHO VOTED IN ELECTION 2016, STATEWIDE.	Lindsey Handling
20170200	6/23/17	Senator Konni Burton	\$ 318.04	\$318.04		complete	VOTER DATA: LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY VOTERS WITH TEXAS MAILING ADDRESS, SENATE DISTRICT 10. TARRANT COUNTY.	
20170201	6/28/17	Senator Miles	\$ 295.83	\$295.83		complete	VD List of voters, only active, only with TX mailing address, SD 13	
20170202	6/28/17	Senator Whitmire	\$ 304.61	\$304.61		complete	VD SENATE DISTRICT # 15 HARRIS COUNTY	
20170203	6/29/17	Kobach Kris - Presidential Advisory Commission - Handled by Lindsey	\$ -			Lindsey Handling	VOTER DATA FILE:	Lindsey Handling
20170204	6/29/17	Kobach Kris - Presidential Advisory Commission - Handled by Lindsey	\$ -			Lindsey Handling	VOTING HISTORY FILE: LIST OF REGISTERED VOTERS IN ACTIVE, SUSPENSE AND CANCELLED STATUS WHO VOTED IN ELECTIONS SINCE 2006, STATEWIDE.	Lindsey Handling

20170205	6/29/17		Kobach Kris - Presidential Advisory Commission - Handled by Lindsey	\$ -			Lindsey Handling	VOTING HISTORY: 2009-2011	Lindsey Handling
20170206	6/29/17		Kobach Kris - Presidential Advisory Commission - Handled by Lindsey	\$ -			Lindsey Handling	VOTING HISTORY FILE: ELECTIONS 2012-2014	Lindsey Handling
20170207	6/29/17		Kobach Kris - Presidential Advisory Commission - Handled by Lindsey	\$ -			Lindsey Handling	VOTING HISTORY: 2015-PRESENT	Lindsey Handling
20170208	6/29/17		Rep. John Kuempel	\$ 152.55	\$152.55		complete	VD LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY WITH TX MAILING ADDRESS, GUADALUPE/WILSON	
20170209	6/29/17		Rep. Metcalf	\$ 142.99	\$142.99		complete	VD LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY VOTERS WITH TX MAILING ADDRESS, HD 16, MONTGOMERY.	
20170210	6/29/17		Senator Craig Estes	\$ 329.28	\$329.28		complete	List of Voters, only in active status, only voters with Texas mailing address, Senate District 30.	TO BE INVOICED
20170211	7/5/17		Susan Carleson	\$ 1,766.09	\$1,777.09	\$11.00	complete	VH - List of voters in active suspense and cancelled status who voted in the 2008, 2012 and 2016 General Elections, statewide.	
20170212	7/10/17		Rep. Rick Miller	\$ 108.04	\$108.04		complete		
20170213	7/10/17		Senator Charles Perry	DISREGARD	DISREGARD	DISREGARD	DISREGARD	VD LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY WITH TX MAILING ADDRESS, SD 28, TAYLOR COUNTY.	
20170214	7/10/17		Senator Don Huffines - confirmed going thru Senate Publications not paying with CC	\$ 311.37	\$311.37		complete	VD - LIST OF ONLY VOTERS WITH TEXAS MAILING ADDRESS, ONLY ACTIVE VOTERS, SD 16	
20170215	7/10/17		Rep. Raymond	\$ 124.63	\$124.63		complete	VH - LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY WITH TEXAS MAILING ADDRESS, WHO VOTED IN THE 2014 AND 2016 PRIMARY ELECTIONS (DEM AND REP). HD 42.	
20170216	7/10/17		Matthew Lakin	\$ 1,465.07	\$1,465.07		complete	VH LIST OF VOTERS, IN ACTIVE AND SUSPENSE STATUS, WHO VOTED IN THE 2016 PRIMARIES, 2016 PRIMARY RUNOFFS, 2016 GENERAL, 2014 GENERAL, STATEWIDE, HISPANIC SURNAME FLAGGED.	
20170217	7/11/17		Rep. Wayne Faircloth	\$ 107.04	\$107.04		complete	VH - LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY VOTERS WITH TEXAS MAILING ADDRESS, WHO VOTED IN 2016 MARCH PRIMARY ELECTIONS REP AND DEM, HD 23. CHAMBERS/GALVESTON.	
20170218	7/11/17		Rep. Wayne Faircloth	ESTIMATE	ESTIMATE	ESTIMATE	ESTIMATE	VH - LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY VOTERS WITH TEXAS MAILING ADDRESS, WHO VOTED IN 2016 MARCH PRIMARY ELECTIONS REP AND DEM, HD 23. CHAMBERS/GALVESTON.	
20170219	7/11/17		Rep. Philip Cortez	\$ 143.99	\$143.99		complete	VD LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY VOTERS WITH TEXAS MAILING ADDRESS, HD 117, BEXAR COUNTY.	
20170220	7/14/17		Senator Zaffirini	\$ 340.24	\$340.24		complete	VH LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY WITH TEXAS MAILING ADDRESS, WHO VOTED IN THE GENERAL ELECTIONS OF 2010,2012,2014,2016. SD 21.SEVERAL COUNTIES.	
20170221	7/11/17		Rep. Parker	\$ 217.93	\$217.93		complete	VH: LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY WITH TEXAS MAILING ADDRESS, WHO VOTED IN THE 2014 PRIMARY & GENERAL ELECTIONS, 2016 PRIMARY & GENERAL ELECTIONS. HD 63. DENTON COUNTY.	
20170222	7/20/17		Senator Charles Perry	\$ 288.55	\$288.55		complete	VD LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY WITH TX MAILING ADDRESS, SD 28, SEVERAL COUNTIES.	
20170223	7/21/17		Rep. Laubenberg	ESTIMATE	ESTIMATE	ESTIMATE	ESTIMATE	VH LIST OF VOTERS, ONLY IN ACTIVE STATUS, WITH ONLY TX MAILING ADDRESS, WHO VOTED IN THE 2014 PRIMARY, 2016 PRIMARY, 2016 GENERAL, HD 89, COLLIN COUNTY.	
20170224	7/21/17		Rep. Stucky	\$ 146.04	\$146.04		complete	VH LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY VOTERS WITH TX MAILING ADDRESS, WHO VOTED IN THE NOVEMBER 2014 GENERAL, NOVEMBER 2016, HD 64.	
20170225	7/21/17		Rep. Burrows	\$ 239.71	\$239.71		complete	VH LIST OF VOTERS, ONLY IN ACTIVE STATUS, WITH ONLY TX MAILING ADDRESS, WHO VOTED IN THE 2012, 2014 & 2016 GENERAL & PRIMARY ELECTIONS, HD 83.	
20170226	7/21/17		Shannan Sorrell	\$ -			ESTIMATE		
20170227	7/21/17		Shannan Sorrell	\$ -			ESTIMATE		
20170228	7/18/17		Rep. Bobby Guerra	\$ 131.62	\$131.62		complete	VD LIST OF VOTERS, ONLY IN ACTIVE STATUS, WITH ONLY TX MAILING ADDRESS, HD 41.	
20170229	7/18/17		Senator Kolkhorst	\$ 318.19	\$318.19		complete	VD LIST OF VOTERS, IN ACTIVE STATUS, WITH ONLY TX MAILING ADDRESS, SD 18	
20170230	7/18/17		Rep. Gary VanDeaver	\$ 141.75	\$141.75		complete	VD LIST OF VOTERS, IN ACTIVE STATUS, WITH ONLY TX MAILING ADDRESS, HD 1.	
20170231	7/19/17		Rep. Uresti	\$ 137.55	\$137.55		complete	VD LIST OF VOTERS, ACTIVE, TX MAILING ADDRESS, HD 118.	
20170232	7/20/17		Senator Kirk Watson	\$ 334.54	\$334.54		complete	VD LIST OF VOTERS, ACTIVE ONLY, WITH TX MAILING ADDRESS ONLY, SD 14.	
20170233	7/20/17		Tony Johnson	\$ 1,141.34	\$1,152.34	\$11.00	complete	SEND VIA FEDEX VH LIST OF VOTERS, ONLY ACTIVE, STATEWIDE, PRIMARY AND GENERAL 2016.	
20170234	7/20/17		Justin Gargiulo	See PIR# 20170236	See PIR# 20170236	See PIR# 20170236	complete	VD LIST OF VOTERS(NO VOTING HISTORY) IN ACTIVE, SUSPENSE AND CANCELLED STATUS, WITH ONLY TEXAS MAILING ADDRESS, US CONGRESSIONAL DISTRICTS 32, 22, 17.	

20170235	7/21/17		Matthew Larkin	\$ 1,396.13	\$1,396.13		complete	VD FILE, ACTIVE SUSPENSE ACTIVE, STATEWIDE, HISPANIC SURNAME FLAGGED.	
20170236	7/21/17		Justin Gargiulo	\$ 453.50	\$464.50	\$11.00	complete	VD LIST OF VOTERS(NO VOTING HISTORY) IN ACTIVE, SUSPENSE AND CANCELLED STATUS WITH ONLY TX MAILING ADDRESS AND WITH EDR DATES 12/10/16-7/17/17	
20170237	DISREGARD		DISREGARD	\$ -			DISREGARD	# NOT USED	
20170238	7/24/17		Rep. James White	ESTIMATE	ESTIMATE	ESTIMATE	ESTIMATE	VH: LIST OF VOTERS, WHO VOTED IN THE 2016 PRIMARY & GENERAL AND 2014 GENERAL, ONLY ACTIVE VOTERS, ONLY WITH TX MAILING ADDRESS, HD 19.	
20170239	7/24/17		Rep. Frullo	\$ 135.69	\$135.69		complete	VD ONLY ACTIVE ONLY WITH TX MAILING ADDRESS HD 84	
20170240	7/25/17		Rep. Drew Springer	\$ 115.35	\$115.35		complete	VH LIST OF VOTERS, IN ACTIVE STATUS ONLY, WITH ONLY TX MAILING ADDRESS, WHO VOTED IN THE 2016 GENERAL ELECTION, HD 68.	
20170241	7/25/17		Rep. Charlie Geren	\$ 143.34	\$143.34		complete	VD ONLY ACTIVE VOTERS, ONLY WITH TX MAILING ADDRESS, HD 99, TARRANT COUNTY.	
20170242	7/25/17		Christopher Barker	\$ 1,267.54	\$1,267.54		complete	VD LIST OF VOTERS, ACTIVE AND SUSPENSE, STATEWIDE.	
20170243	7/26/17		Rep. Brooks Landgraf	\$ 137.34	\$137.34		complete	VD LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY WITH TEXAS MAILING ADDRESS, HD 81.	
20170244	7/26/17		Rep. Flynn	DISREGARD	DISREGARD	DISREGARD	DISREGARD		
20170245	7/26/17		Rep. Gina Hinojosa	ESTIMATE	ESTIMATE	ESTIMATE	ESTIMATE		
20170246	7/26/17		Rep. Mark Keough	\$ 148.98	\$148.98		complete	VD LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY VOTERS WITH TX MAILING ADDRESS, HD 15, MONTGOMERY COUNTY.	
20170247	7/26/17		Senator Robert Nichols	\$ 326.56	\$326.56		complete	VD ONLY ACTIVE, ONLY TX MAILING ADDRESS, SD 3.	
20170248	7/26/17		Brendan Cox	See PIR# 20170250	See PIR# 20170250	See PIR# 20170250	complete	VH 2012-2013 MEDINA, GALVESTON COUNTIES, ACTIVE SUSPENSE AND CANCELLED VOTERS.	
20170249	7/26/17		Brendan Cox	See PIR# 20170250	See PIR# 20170250	See PIR# 20170250	complete	VH 2014-2015 MEDINA, GALVESTON COUNTIES, ACTIVE SUSPENSE AND CANCELLED VOTERS.	
20170250	7/26/17		Brendan Cox	\$ 332.77	\$343.77	\$11.00	complete	VH 2016 MEDINA, GALVESTON COUNTIES, ACTIVE SUSPENSE AND CANCELLED VOTERS.	
20170251	7/27/17		Rep. Trent Ashby	\$ 122.64	\$122.64		complete	VH LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY WITH TX MAILING ADDRESS, WHO VOTED IN THE 2016 NOV GENERAL ELECTION, HD 57.	
20170252	7/27/17		US Congressman Ted Poe	\$ 97.48	\$97.48		complete	VD LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY WITH TX MAILING ADDRESS, WITH EDR 04/01/17-07/31/17, US CONGRESS DISTRICT# 2. HARRIS COUNTY.	
20170253	7/28/17		Rep. Dennis Paul	\$ 145.59	\$145.59		complete	VD, ONLY ACTIVE, ONLY MAILING TX ADDRESS, HD 129.	
20170254	7/28/17		Rep. Diana Arevalo	ESTIMATE	ESTIMATE	ESTIMATE	ESTIMATE	VH - HD 116, Nov. General Election 2016, 2016 Primaries	
20170255	7/28/17		Rep. Justin Rodriguez	ESTIMATE	ESTIMATE	ESTIMATE	ESTIMATE	VD LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY WITH TX MAILING ADDRESS, HD 125.	
20170256	7/28/17		Shannan Sorrell	See PIR# 20170257	See PIR# 20170257	See PIR# 20170257	complete	VH NOV 2016 MAY 2016 MARCH 2016	
20170257	7/28/17		Shannan Sorrell	\$ 341.51	\$352.51	\$11.00	complete	VH NOV 2015 NOV 2014, PRIMARY RUNOFF 2014, PRIMARY 2014 PRIMARY RUNOFF 2012, PRIMARY 2012	
20170258	7/28/17		Speaker Joe Straus	\$ 149.29	\$149.29		complete	VD LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY WITH TX MAILING ADDRESS, HD 121.	
20170259	7/26/17		Senator Dawn Buckingham	\$ 319.43	\$319.43		complete	VD LIST OF VOTERS ONLY IN ACTIVE STATUS, ONLY WITH TEXAS MAILING ADDRESS, SD 24..	
20170260	7/21/17		Bernard Fraga	\$ -			waiting on pmt	VD LIST OF VOTERS IN ACTIVE, SUSPENSE AND CANCELLED STATUS, STATEWIDE, HISPANIC SURNAME FLAGGED.	
20170261	7/28/17		Rep. Diana Arevalo	\$ 103.72	\$103.72		complete	VH.2016 PRIMARY	
20170262	7/28/17		Rep. Diana Arevalo	ESTIMATE	ESTIMATE	ESTIMATE	ESTIMATE	VH.2016 GENERAL	
20170263	7/31/17		Rep. Kevin Roberts	\$ 140.92	\$140.92		complete	VD LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY WITH TX MAILING ADDRESS, HARRIS COUNTY, HD 126.	
20170264	7/31/17		Rep. Dan Flynn	\$ 130.30	\$130.30		complete	VH LIST OF VOTERS, ONLY ACTIVE, ONLY WITH TX MAILING ADDRESS, HD 2, WHO VOTED IN THE 2016, 2014,2012 PRIMARY ELECTIONS.	
20170265	7/31/17		John Andersen	\$ 467.68	\$467.68		complete	VD LIST OF VOTERS, ACTIVE AND SUSPENSE STATUS, HARRIS COUNTY, HISPANIC SURNAME FLAGGED.	
20170266	8/1/17		Chonita Ruiz	\$ 106.66	\$117.66	\$11.00	complete	VH ACTIVE, SUSPENSE, CANCELLED STATUS, ALL ELECTIONS 2006-2017, MALES ONLY, GRIMES COUNTY.	
20170267	8/1/17		Rep. Elkins	\$ 140.52	\$140.52		complete	HD135 HARRIS PART	
20170268	8/1/17		Rep. Sarah Davis	\$ 153.08	\$153.08		complete	VD LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY WITH TX MAILING ADDRESS, HD 134.	Provided to Rep. today 8/4/17
20170269	8/1/17		Rep. Shaheen	\$ 108.58	\$108.58		complete	VOTING HISTORY ONLY FOR THE 2016 REP. & DEM PRIMARY'S	
20170270	8/2/17		Rep. Eric Johnson	\$ 132.40	\$132.40		complete	HD 100	
20170271	8/2/17		Rep. Zerwas	\$ 151.31	\$151.31		complete	HD 28	
20170272	8/3/17		Rep. Ed Thompson	ESTIMATE	ESTIMATE	ESTIMATE	ESTIMATE	VH - 2016 GENERAL ELECTION - ESTIMATE HD 29	Provided to Rep. 8/8/17
20170273	8/3/17		Rep. Ed Thompson	\$ 108.30	\$108.30		complete	VH 2016 PRIMARY ELECTIONS - HD29 BRAZORIA	Provided to Rep. 8/8/17
20170274	8/3/17		Rep. White	\$ 152.26	\$152.26		complete	VH - ACTIVE VOTERS BETWEEN 40-100 FOR THE 2016 GENERAL & PRIMARY'S AND 2014 GENERAL	
20170275	8/3/17		Rep. Justin Rodriguez	CANCELLED	CANCELLED	CANCELLED	CANCELLED	VH PRIMARY'S 2016 HD 125	
20170276	8/3/17		Rep. Rodney Anderson	\$ 131.93	\$131.93		complete	HD 105 VD	
20170277	8/4/17		Rep. Rose	\$ 129.70	\$129.70		complete	HD 110 ALL - VD	

20170278	8/7/17	Rep. Gene Wu	\$ 117.57	\$117.57		complete	VD HD 137 HARRIS COUNTY	Provided to Rep. 8/8/17
20170279	8/4/17	Bernard Fraga	\$ -			waiting on pmt	VH VOTING HISTORY FOR ACTIVE, SUSPENSE AND CANCELLED STATUS, STATEWIDE, HISPANIC SURNAME FLAGGED, FOR 2016, 2014, 2012, 2010 AND 2008 GENERAL ELECTIONS	
<b>Due to typo issue PI Log Numbers 20170280 - 20172079 were not used.</b>								
20172080	8/4/2017	Rep. Jodie Laubenberg	\$ 132.79	132.79		complete	HD 89 VOTING HISTORY 2016 GENERAL	
20172081	8/4/2017	Rep. Charles Anderson	\$ 136.48	136.48		complete	VD HD 56	
20172082	8/4/17	Rep. Lyle Larson	\$ 278.44	\$278.44		complete	AND GENERAL	
20172083	8/4/17	Rep. Nicole Collier	\$ 133.55	\$133.55		complete	V HISTORY HDF 95 TARRANT - 2014 & 2016 PRIMARY'S AND 2016 GENERAL ELECTION	
20172084	8/4/17	Rep. Kyle Kacal	\$ 116.04	\$116.04		complete	VD FOR VARIOUS PRECINCTS FOR BRAZOS, FALLS, LIMESTONE, MCLENNAN AND ROBERTSON COUNTIES.	
20172085	8/4/17	Rep. Donna Howard	\$ 144.77	\$144.77		complete	VD FOR VARIOUS PRECINCTS FOR TRAVIS COUNTY	
20172086	8/4/17	Rep. Abel Herrero	\$ 138.17	\$138.17		complete	VD FOR HD 34 NUECES COUNTY	
20172087	8/7/17	Rep. Ramon Romero, Jr.	\$ 99.33	\$99.33		complete	HD 90 TRAVIS - VOTING HISTORY FOR 2016 PRIMARY'S.	
20172088	8/7/17	Rep. Dustin Burrows	DISREGARD	DISREGARD	DISREGARD	DISREGARD		
20172089	8/7/17	Rep. Cesar Blanco	\$ 133.55	\$133.55		complete	VD HD 76 EL PASO	
20172090	8/7/17	Rep. Paul Workman	\$ 119.35	\$119.35		complete	VOTING HISTORY 2016 PRIMARY'S HD 47 TRAVIS	
20172091	8/8/17	Rep. Greg Bonnen	\$ 120.88	\$120.88		complete	VOTING HISTORY FOR VARIOUS PRECINCTS IN GALVESTON FOR THE 2016 GENERAL ELECTION AND 2016 PRIMARY'S	
20172092	8/8/17	Logan Churchwell	\$ 112.28	\$123.28	\$11.00	complete	VOTER DATA FOR STARR COUNTY - ALL PRECINCTS - INCLUDE ACTIVE, SUSPENSE, CANCELED AND HISPANIC SURNAME FLAGGED	
20172093	8/8/17	Rep. Travis Clardy	\$ 137.46	\$137.46		complete	HD 11 FOR CHEROKEE, NACAGDOCHES AND RUSK COUNTIES - VOTER DATA	
20172094	8/8/17	Rep. Chris Paddie	\$ 227.28	\$227.28		complete	VOTING HISTORY FOR CASS, MARION, HARRISON, PANOLA, SHELBY AND SABINE COUNTIES FOR 2013 CONST. AMEND., 2014 PRIMARY, RUNOFFS AND GENERAL, 2015 CONST. AMEND. AND 2016 PRIMARY RUNOFFS AND GENERAL ELECTIONS	
20172095	8/8/17	Rep. Hugh Shine	\$ 146.80	\$146.80		complete	VOTING HISTORY FOR HD 55 BELL COUNTY FOR GENERAL ELECTIONS FOR 2012, 2014 & 2016	
20172096	8/8/17	Rep. Phelan	\$ 111.93	\$111.93		complete	VOTING HISTORY FOR HD 21 JEFFERSON & ORANGE COUNTIES FOR 2014 GENERAL ELECTION	
20172097	8/1/17	Rep. Bailes	\$ 137.16	\$137.16		complete	VD LIST OF VOTERS, IN ACTIVE ONLY STATUS, ONLY VOTERS WITH TX MAILING ADDRESS, HD 18 (LIBERTY, SAN JACINTO, WALKER).	
20172098	8/4/17	Rep. Jay Dean	ESTIMATE	ESTIMATE	ESTIMATE	ESTIMATE	VD LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY WITH TX MAILING ADDRESS, HD 7 (GREGG, UPSHUR)	
20172099	8/4/17	Rep. Jay Dean	ESTIMATE	ESTIMATE	ESTIMATE	ESTIMATE	VH PRIMARY ELECTIONS 2016	
20172100	8/4/17	Rep. Jay Dean	ESTIMATE	ESTIMATE	ESTIMATE	ESTIMATE	VH GENERAL ELECTION 2016	
20172101	8/4/17	Amy Kraushaar	\$ -			ESTIMATE	VH - 2016 GENERAL ELECTION, ABSENTEE BALLOTS RECEIVED. ACTIVE VOTERS.	
20172102	8/8/17	Congressman Lamar Smith	\$ 96.52	\$96.52		complete	ACTIVE VOTERS BETWEEN 6/1/17-7/31/17 IN US. CONGRESSIONAL DISTRICT 21 TO INCLUDE THE COUNTIES OF BANDERA, BEXAR, BLANCO, COMAL, GILLESPIE, HAYS, KENDALL, KERR, REAL AND TRAVIS	
20172103	8/9/17	Rep. Scott Sanford	ESTIMATE	ESTIMATE	ESTIMATE	ESTIMATE	ONLY VOTERS WITH TEXAS MAILING ADDRESS AGES 35 TO 99 ONLY ACTIVE VOTERS MARCH 2016 PRIMARIES (REP. AND DEM) COLLIN COUNTY: HD 70	
20172104	8/9/17	Rep. Cole Hefner	\$ 141.93	\$141.93		complete	VD ONLY ACTIVE VOTERS ONLY WITH TX MAILING ADDRESS HD 5	
20172105	8/9/17	Rep. Mary Perez	\$ 121.52	\$121.52		complete	VD ONLY ACTIVE ONLY WITH TX MAILING ADDRESS HD 144, HARRIS COUNTY.	
20172106	8/9/17	Rep. Phil King	\$ 133.07	\$133.07		complete	VH ONLY ACTIVE VOTERS ONLY WITH TX MAILING ADDRESS 2016 GENERAL ELECTION PARKER, WISE HD 61	
20172107	8/4/17	Hasan Mahdi	\$ -			JUST COUNTS	COUNTS BY COUNTY BY CONGRESSIONAL DISTRICT NUMBERS, STATEWIDE	
20172108	8/10/17	Rep. Angie Button	\$ 137.32	\$137.32		complete	VD HD 112 ONLY ACTIVE VOTERS ONLY VOTERS WITH TX MAILING ADDRESS	
20172109	8/10/17	Senator Bob Hall	\$ 312.70	\$312.70		complete	VD LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY WITH TX MAILING ADDRESS, SD 2.	
20172110	8/9/17	Tony Johnson	\$ -			complete	FILE AT FINANCE/ADJUSTMENT	
201700010	9/6/16	John Witson	see 201700011	see 201700011	see 201700011	see 201700011	VOTING HISTORY FILE: 2016, 2014, 2012 PRIMARIES 2010, 2012, 2014 GENERAL	
201700011	9/6/16	John Witson	\$ 389.03	\$389.03	\$0.00	complete	VOTERS, ACTIVE & SUSPENSE, SEVERAL COUNTIES.	FTP
256107 256118 256119 256159 256160 256167 256169 256170	5/3/17	Northern District of Texas - Anne Brabham	\$ -	\$0.00	\$0.00	complete	Produced out of TEAM Reports. 100 counties, deceased and all other cancelled voters. March 2015-May 1, 2017	CD
20172111	8/10/17	Rep. Ryan Guillen	ESTIMATE	ESTIMATE	ESTIMATE	ESTIMATE	ESTIMATE VD LIST OF VOTERS ONLY IN ACTIVE STATUS, ONLY WITH TX MAILING ADDRESS, HD 31	
20172112	8/9/17	Tony Johnson	\$ 1,208.72	\$1,219.72	\$11.00	complete	VD ONLY ACTIVE VOTERS STATEWIDE	

20172113	8/10/17	Rep. Oliveira	\$ 106.16	\$106.16		complete	VH LIST OF VOTERS ONLY IN ACTIVE STATUS, ONLY WITH TX MAILING ADDRESS, WHO VOTED IN THE 2014 AND 2016 PRIMARY ELECTIONS, HD 37
20172114	8/11/17	Rep. Morrison	\$ 143.99	\$143.99		complete	VD ONLY ACTIVE VOTERS ONLY TX MAILING ADDRESS HD 30
20172115	8/11/17	Rep. Scott Sanford	ESTIMATE	ESTIMATE	ESTIMATE	ESTIMATE	ONLY VOTERS WITH TEXAS MAILING ADDRESS AGES 45 TO 99 ONLY ACTIVE VOTERS MARCH 2016 PRIMARIES (REP. AND DEM) COLLIN COUNTY: HD 70
20172116	8/11/17	Rep. Justin Rodriguez	\$ 104.45	\$104.45		complete	VH PRIMARY'S 2016 HD 125 ONLY ACTIVE VOTERS, ONLY VOTERS WITH TX MAILING ADDRESS.
20172117	7/10/17	Sara Enochs	\$ 208.41	\$219.41	\$11.00	complete	VH LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY WITH TX MAILING ADDRESS, WHO VOTED IN THE 2016 PRIMARY ELECTION (DEMOCRATIC), TRAVIS COUNTY.
20172118	8/11/17	Rep. Tom Craddick	\$ 138.30	\$138.30		complete	VD - LIST OF ONLY VOTERS WITH TX MAILING ADDRESS, ONLY ACTIVE VOTERS, HD 82.
20172119	8/14/17	Rep. Ernest Bailes	\$134.57	\$134.57		complete	VH 2016 GENERAL ELECTION 2016 PRIMARY ELECTION(DEM/REP) HD 18 LIBERTY, SAN JACINTO, WALKER.
20172120	8/14/17	Rep. John Raney	ESTIMATE	ESTIMATE	ESTIMATE	ESTIMATE	VD LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY VOTERS WITH TX MAILING ADDRESS, HD 14, BRAZOS COUNTY.
20172121	8/14/17	Texas Democratic Party	\$ 1,269.11	\$1,280.11	\$11.00	complete	VD FILE LIST OF REGISTERED VOTERS, IN ACTIVE AND SUSPENSE STATUS, STATEWIDE. REQUESTOR IS PICKING UP FILE
20172122	8/15/17	Rep. Scott Sanford	ESTIMATE	ESTIMATE	ESTIMATE	ESTIMATE	ONLY VOTERS WITH TEXAS MAILING ADDRESS AGES 50 TO 99 ONLY ACTIVE VOTERS MARCH 2016 PRIMARIES (REP. AND DEM) COLLIN COUNTY: HD 70
20172123	8/15/17	Senator Creighton	\$ 328.13	\$328.13		complete	VD LIST OF REGISTERED VOTERS, ONLY IN ACTIVE STATUS, ONLY WITH TEXAS MAILING ADDRESS, SD 4.
20172124	8/16/17	Rep. John Raney	\$ 143.16	\$143.16		complete	VH LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY VOTERS WITH TX MAILING ADDRESS, HD 14, BRAZOS COUNTY, WHO VOTED IN THE PRIMARY 2014/2016 AND IN THE GENERAL ELECTIONS 2014/2016.
20172125	8/7/17	Rep. Ramon Romero, Jr.	DISREGARD	DISREGARD	DISREGARD	DISREGARD	
20172126	7/28/17	Shannan Sorrell	See PIR# 20172127	See PIR# 20172127	See PIR# 20172127	complete	VH(3 counties missing in request that was run 7/28), VH,NOV 2015,NOV 2014,PRIMARY RUNOFF &,PRIMARY 2014,PRIMARY RUNOFF & PRIMARY 2012
20172127	7/28/17	Shannan Sorrell	\$ 13.70	\$13.70		complete	VH(3 counties missing in request that was run 7/28)VH 2016 GENERAL, 2016 PRIMARY & PRIMARY RUNOFF
20172128	8/17/17	Rep. Ana Hernandez	\$ 125.40	\$125.40		complete	VD LIST OF VOTERS, ONLY ACTIVE VOTERS, ONLY VOTERS WITH TEXAS MAILING ADDRESS, HD 143.
20172129	8/17/17	Senator Brian Birdwell	\$ 319.83	\$319.83		complete	VD LIST OF VOTERS, ONLY ACTIVE VOTERS, ONLY WITH TEXAS MAILING ADDRESS, SD 22.
20172130	8/18/17	Rep. Scott Sanford	\$ -			ESTIMATE	ONLY VOTERS WITH TEXAS MAILING ADDRESS AGES 55 TO 99 ONLY ACTIVE VOTERS MARCH 2016 PRIMARIES (REP. AND DEM) COLLIN COUNTY: HD 70
20172131	8/21/17	Bruce Stringfellow	\$ 1,269.82	\$1,280.82	\$11.00	complete	VD - LIST OF REGISTERED VOTERS, STATEWIDE, ACTIVE AND SUSPENSE.
20172132	8/22/17	Rep. Barbara Gervin-Hawkins	\$ 137.95	\$137.95		complete	VD LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY VOTERS WITH TEXAS MAILING ADDRESS, HD 120
20172133	8/22/17	Rep. Gina Hinojosa	\$ -			ESTIMATE	VD LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY WITH TX MAILING ADDRESS, HD 49, TRAVIS COUNTY, AGES 65 AND OLDER.
20172134	8/21/17	US District Court-Eastern-Beth Harper	\$ 463.90	\$474.90	\$11.00	complete	VD LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY WITH TEXAS MAILING ADDRESS, 43 COUNTIES AS PER LIST SUBMITTED
20172135	8/23/17	Logan Churchwell	\$ 66.11	\$66.11		complete	VOTING HISTORY FOR STARR COUNTY - ALL PRECINCTS - INCLUDE ACTIVE, SUSPENSE, CANCELED AND HISPANIC SURNAME FLAGGED. ALL ELECTIONS AVAILABLE 2006 TIL PRESENT.
20172136	8/23/17	Rep. Darby	\$ 137.75	\$137.75		complete	VD LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY VOTERS WITH TEXAS MAILING ADDRESS, HD 72.
20172137	8/23/17	Rep. Frullo	see PIR# 20172138	see PIR# 20172138		complete	VD LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY WITH TEXAS MAILING ADDRESS, WITH EDR 3/2/16-8/23/17, HD 84.
20172138	8/23/17	Rep. Frullo	\$ 120.60	\$120.60		complete	VH LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY WITH TEXAS MAILING ADDRESS, HD 84, WHO VOTED IN THE 2014 AND 2016 PRIMARY.
20172139	8/24/17	Adam Zimmerman - c/o Glenn Maxey	\$ 350.46	\$361.46	\$11.00	complete	VH (BY MAIL ONLY)
20172140	8/25/17	Jesse Seidman - COUNTS ONLY	\$ -			COUNTS ONLY	COUNTS ONLY REGISTERED VOTERS CONGRESSIONAL DISTRICT 23
20172141	8/25/17	Jesse Seidman - COUNTS ONLY	\$ -			COUNTS ONLY	COUNTS ONLY REGISTERED VOTERS CONGRESSIONAL DISTRICT 23. WHO VOTED IN THE 2016 GENERAL ELECTION.
20172142	8/28/17	Rep. Gina Hinojosa	\$ -			ESTIMATE	VH LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY WITH TX MAILING ADDRESS, HD 49, TRAVIS COUNTY, AGES 65 AND OLDER WHO VOTED IN THE 2016 GENERAL ELECTION.

20172143	8/30/17	Wendy	\$ -			COUNTS ONLY	JUST NEED COUNTS VD - VOTERS, ACTIVE & SUSPENSE, STATEWIDE.
20172144	8/30/17	Wendy	\$ -			COUNTS ONLY	JUST NEED COUNTS VH - VOTERS, ACTIVE, SUSPENSE AND CANCELLED, STATEWIDE, WHO VOTED IN THE 2016 GENERAL ELECTION.
20172145	8/31/17	Senator Eddie Lucio	\$ 291.86	\$291.86		complete	VD LIST OF VOTERS, ONLY ACTIVE VOTERS, ONLY WITH TEXAS MAILING ADDRESS, SD 27.
20172146	8/31/17	Steven Setliff	See PIR# 20172147	See PIR# 20172147		complete	VD LIST OF VOTERS, IN ACTIVE AND SUSPENSE STATUS, WICHITA COUNTY.
20172147	8/31/17	Steven Setliff	\$ 299.07	\$299.07		complete	VH LIST OF VOTERS, IN ACTIVE AND SUSPENSE STATUS, WICHITA COUNTY, WHO VOTED IN ALL AVAILABLE STATEWIDE ELECTIONS 2000 UNTIL PRESENT.
20172148	8/31/17	Rep. Matt Rinaldi	\$ 136.64	\$136.64		complete	VD LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY WITH TEXAS MAILING ADDRESS, HD 115.
20172149	8/31/17	Rep. Byron Cook	\$ 135.76	\$135.76		complete	VD LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY WITH TEXAS MAILING ADDRESS, HD 8.
20172150	8/31/17	Jeffrey Payne	\$ 1,210.36	\$1,221.36	\$11.00	complete	VD LIST OF VOTERS, ONLY IN ACTIVE STATUS, STATEWIDE.
20172151	9/1/17	Rep. Hinojosa	\$ 101.74	\$101.74		complete	VH LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY WITH TX MAILING ADDRESS, HD 49, TRAVIS COUNTY, AGES 60 AND OLDER WHO VOTED IN THE 2016 GENERAL ELECTION.
20172152	9/1/17	Rep. John Cyrier	\$ 110.00	\$110.00		complete	VH LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY WITH TX MAILING ADDRESS, WHO VOTED IN THE 2014 NOV. GENERAL ELECTION, HD 17.
20172153	9/1/17	Rep. Briscoe Cain	\$ 129.39	\$129.39		complete	VH LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY WITH TEXAS MAILING ADDRESS, AGES 55-100 WHO VOTED IN THE 2012, 2014 AND 2016 GENERAL ELECTIONS, HD 128.
20172154	9/1/17	Rep. Sheffield	\$ -			complete	VD LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY WITH TX MAILING ADDRESS, HD 59
20172155	9/5/17	Rep. Minjarez	\$ 108.68	\$108.68		complete	VD LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY WITH TX MAILING ADDRESS, ONLY AGES 55 TO 90, HD 124.
20172156	9/5/17	Norman Pappous	\$ 100.46	\$100.46		complete	VD LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY WITH TEXAS MAILING ADDRESS, GALVESTON COUNTY, PRECINCTS# 223,224,309,316,274,275,276,221
20172157	9/6/17	Rep. Sheffield	\$ 119.48	\$119.48		complete	VH LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY WITH TX MAILING ADDRESS, HD 59, WHO VOTED IN THE 2016 GENERAL ELECTION
20172158	9/7/17	Senator Juan Hinojosa	\$ 302.15	\$302.15		complete	VD LIST OF VOTERS, ONLY ACTIVE STATUS, ONLY WITH TEXAS MAILING ADDRESS, SD 20.
20172159	9/7/17	Ron Williams-Commission on Elections Integrity	\$ -			waiting on Lindsey	
20172160	9/8/17	Rep. Four Price	\$ 115.94	\$115.94		complete	VOTING HISTORY: LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY WITH TX MAILING ADDRESS, WHO VOTED IN THE 2016 NOVEMBER GENERAL ELECTION, HD 87.
20180000	9/6/17	Paresh Patel	\$ -			WITHDRAWN	VOTER DATA FILE: LIST OF VOTERS IN ACTIVE, SUSPENSE AND CANCELLED VOTERS, STATEWIDE, HISPANIC SURNAME FLAGGED.
20180001	9/6/17	Paresh Patel	\$ -			WITHDRAWN	VOTING HISTORY FILE: LIST OF VOTERS IN ACTIVE, SUSPENSE AND CANCELLED STATUS, STATEWIDE, HISPANIC SURNAME FLAGGED WHO VOTED IN THE: GENERAL ELECTIONS OF 2008,2012 AND 2016. PRIMARIES 2008 AND 2016
20180002	9/11/17	Senator Royce West	\$ 306.11	\$306.11		complete	VD LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY WITH TEXAS MAILING ADDRESS, SD 23.
20180003	9/11/17	Paul Graham	\$ 1,270.97	\$1,270.97		complete	VD LIST OF VOTERS, IN ACTIVE AND SUSPENSE STATUS, STATEWIDE, HISPANIC SURNAME FLAGGED.
20180004	9/11/17	Rep. Ron Reynolds	\$ 143.02	\$143.02		complete	VD LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY VOTERS WITH TEXAS MAILING ADDRESS, HD 27.
20180005	9/11/17	Andrew Koch	\$ 119.74	\$130.74	\$11.00	complete	VOTING HISTORY FILE: LIST OF VOTERS, ONLY IN ACTIVE STATUS, WHO VOTED IN THE 2012, 2014 AND 2016 REPUBLICAN PRIMARY ELECTIONS. HD 72.
20180006	9/11/17	James Austin Foley	\$ 139.63	\$150.63	\$11.00	complete	VD FILE: LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY WITH TEXAS MAILING ADDRESS, HD 62 (DELTA, FANNIN, GRAYSON).
20180007	9/13/17	Paresh Patel	\$ -			WITHDRAWN	VOTING HISTORY FILE: LIST OF VOTERS IN ACTIVE, SUSPENSE AND CANCELLED STATUS, HISPANIC SURNAME FLAGGED, WHO VOTED IN THE 2008, 2012 & 2016 GENERAL ELECTIONS, 2008 & 2016 PRIMARY ELECTIONS.
20180008	9/13/17	Paresh Patel	\$ -			WITHDRAWN	VOTING HISTORY FILE: LIST OF VOTERS IN ACTIVE, SUSPENSE AND CANCELLED STATUS, HISPANIC SURNAME FLAGGED, WHO VOTED IN THE 2008, 2012 & 2016 GENERAL ELECTIONS, 2008 & 2016 PRIMARY ELECTIONS. HARRIS COUNTY.
20180009	9/12/17	Derek Ryan	\$ 1,270.82	\$1,281.82	\$11.00	complete	VD statewide, hispanic surname flagged,active and suspense.

20180010	9/13/17		Senator Kelly Hancock	\$ 293.73	\$304.73	\$11.00	complete	VD LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY VOTERS WITH TEXAS MAILING ADDRESS, SD 9.
20180011	9/13/17		Ron Williams-Commission on Elections Integrity	\$ -			in process	VOTING HISTORY: LIST OF VOTERS, IN ACTIVE SUSPENSE AND CANCELLED STATUS, STATEWIDE, HISPANIC SURNAME FLAGGED WHO VOTED IN THE GENERAL ELECTIONS OF: 2006, 2008, 2010, 2012, 2014, 2016.
20180012			Ostovic Melanie	\$ 1,270.63	\$1,270.63		complete	VD LIST OF VOTERS, IN ACTIVE AND SUSPENSE STATUS, STATEWIDE, HISPANIC SURNAME FLAGGED.
20180013			Rep. Scott Sanford	\$ 101.97	\$101.97		complete	VH LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY WITH TX MAILING ADDRESS, AGES: 55-99, WHO VOTED IN THE 2016 PRIMARY ELECTIONS, HD 70, COLLIN COUNTY.
20180014			Senator Donna Campbell	\$ 339.69	\$339.69		complete	VD LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY WITH TEXAS MAILING ADDRESS, SD 25.
20180015	9/19/17		Rep. Travis Clardy	\$ 113.58	\$113.58		complete	VH LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY WITH TX MAILING ADDRESS, WHO VOTED IN THE 2016 GENERAL ELECTION, HD 11. AGES 40 TO 80.
20180016	9/21/17		Rep. Harold Dutton	\$ -			in process	VD LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY WITH TEXAS MAILING ADDRESS, HD 142. (HARRIS COUNTY).
20180017	9/21/17		Rep. Shawn Thierry	\$ -			in process	VD LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY WITH TEXAS MAILING ADDRESS, HD 146.
20180018	9/22/17		Rep. James White	\$ -			ESTIMATE	VH LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY WITH TEXAS MAILING ADDRESS, AGES 40-70, WHO VOTED IN THE 2016 GENERAL ELECTION, HD 19.
20180019	9/22/17		Rep. Jim Murphy	\$ -			in process	VD LIST OF VOTERS, ONLY IN ACTIVE STATUS, ONLY WITH TEXAS MAILING ADDRESS, HD 133.
20180020	9/25/17		David Kruse	\$ -			in process	

	E12 RATE	E13 RATE	E14 RATE	E15 RATE	E16 RATE
Extract Rate:	\$ 93.75	\$ 156.25	\$ 203.13	\$ 265.63	\$ 328.13
Extract Charges:	\$ 25.73	\$ 19.30	\$ 12.87	\$ 6.43	\$ 3.22
Total Records extracted: 51463					
CD-ROM:				\$ 11.00	
Total Charges:	\$ 119.48	\$ 175.55	\$ 216.00	\$ 283.06	\$ 331.35
Deposit					
<b>Balance Due:</b>	<b>\$ 119.48</b>	<b>\$ 175.55</b>	<b>\$ 216.00</b>	<b>\$ 283.06</b>	<b>\$ 331.35</b>

**EXTRACT RATES FOR COMPUTER CD-ROM, OR DISK**

1 - 124,999 Voters \$ 93.75 + \$ 0.0005 Per Voter	2-Apr-00	\$0.0005000
125,000 - 249,999 Voters \$156.25 + \$ 0.000375 Per Voter	4-Jun-00	\$0.0003750
250,000 - 499,999 Voters \$203.13 + \$ 0.00025 Per Voter	21-Jul-00	\$0.0002500
500,000 – 999,999 Voters \$265.63 + \$ 0.000125 Per Voter	21-Sep-00	\$0.0001250
Over 1,000,000 Voters \$328.13 + \$0.0000625 Per Voter	23-Nov-00	\$0.0000625

**Additional Media Output Charges**

CD-ROM \$11.00 each  
DVD-R \$11.00 each

3888886

6912526

16727457

9179430

7756372

12254117

56718788



CAUSE NO. D-1-GN-17-003451

LEAGUE OF WOMEN VOTERS OF	§	IN THE DISTRICT COURT OF
TEXAS, TEXAS STATE CONFERENCE	§	
OF THE NATIONAL ASSOCIATION	§	
FOR THE ADVANCEMENT OF	§	
COLORED PEOPLE (NAACP) and	§	
RUTHANN GEER,	§	TRAVIS COUNTY, TEXAS
<i>Plaintiff</i>	§	
	§	
v.	§	
	§	
ROLANDO PABLOS, Secretary of State	§	
for the State of Texas, and KEITH	§	
INGRAM, Director, Texas Elections	§	98 <sup>TH</sup> JUDICIAL DISTRICT
Division of the Secretary of State,	§	
<i>Defendant.</i>	§	
	§	

---

**DEFENDANTS' NOTICE OF HEARING**

---

Please take note that pursuant to Judge Tim Sulak's September 25, 2017, oral order, Defendants' Plea to the Jurisdiction in this matter is set for September 29, 2017, at 10:30 a.m.

Date: September 26, 2017

Respectfully submitted,

**KEN PAXTON**  
Attorney General of Texas

**JEFFREY C. MATEER**  
First Assistant Attorney General

**BRANTLEY STARR**  
Deputy First Assistant Attorney General

**JAMES E. DAVIS**  
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Chief, General Litigation Division

/s/ Esteban S.M. Soto

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*ATTORNEYS FOR DEFENDANTS*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing documents has been served on this the 26th day of September, 2017 on the following:

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*(Pending admission pro hac vice)*

/s/ Esteban Soto

ESTEBAN SOTO

No. D-1-GN-17-003451

LEAGUE OF WOMEN VOTERS OF TEXAS,	§	IN THE DISTRICT COURT
TEXAS STATE CONFERENCE OF THE	§	
NATIONAL ASSOCIATION FOR THE	§	
ADVANCEMENT OF COLORED PEOPLE	§	
(NAACP) and RUTHANN GEER,	§	
	§	
<i>Plaintiffs,</i>	§	
	§	
vs.	§	TRAVIS COUNTY, TEXAS
	§	
ROLANDO PABLOS, Secretary of State For the	§	
State of Texas, and KEITH INGRAM, Director,	§	
Texas Elections Division of the Secretary of State,	§	
	§	
<i>Defendants.</i>	§	98 <sup>th</sup> JUDICIAL DISTRICT

**PLAINTIFFS’ RESPONSE TO DEFENDANTS’ PLEA TO JURISDICTION**

TO THE HONORABLE JUDGE OF THIS COURT:

COME NOW the Plaintiffs, LEAGUE OF WOMEN VOTERS OF TEXAS, TEXAS STATE CONFERENCE OF THE NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE (NAACP), and RUTHANN GEER, who make and file this, their Response to the Defendants’ Plea to the Jurisdiction, and would respectfully show the Court as follows:

**I.**  
**INTRODUCTION**

Defendants’ belated Plea to Jurisdiction (the “Plea”), filed two months after Plaintiffs initiated this action, is premised on the fundamental misconception that Texas has not waived immunity for claims against State officials seeking injunctive relief under Texas’s Election Code, like the claims asserted by Plaintiffs. But Texas

clearly has. Specifically, the Election Code expressly provides that a person “who is being harmed or is in danger of being harmed by a violation or threatened violation of this code is entitled to appropriate injunctive relief to prevent the violation from continuing or occurring.” Tex. Elec. Code § 273.081. That is precisely what Plaintiffs seek in this litigation—“entry of a temporary injunction, and after trial, a permanent injunction enjoining the Defendants, Secretary of State Rolando Pablos, and Keith Ingram, Director, Texas Elections Division, from providing the Voter List or any part thereof to the Commission.” Pls.’ Am. Pet. for Decl. J. (“Am. Pet.”) at Prayer for Relief, § A. This section of the Election Code has further been found by Texas courts to create a private right of action to enforce rights under the law, including against the Secretary of State (who Plaintiffs have named as a Defendant here). *See, e.g., City of El Paso v. Tom Brown Ministries*, 505 S.W.3d 124, 139 (Tex. App. 2016) (citing *Osterberg v. Peca*, 12 S.W.3d 31, 48-49 (Tex. 2000)); *see, e.g., Andrade v. NAACP of Austin*, 345 S.W.3d 1, 17 (Tex. 2011). For that reason alone, Defendants claims of sovereign immunity should be rejected.

Moreover, although not required (precisely because Section 273.081 provides an express waiver authorizing this lawsuit), Plaintiffs’ claims are also not subject to a sovereign immunity defense because they are based on Defendants’ threatened non-compliance with State law. Defendants’ assertion that they have not violated Texas law is premature at this stage. Rather, because Plaintiffs’ claims and prayer

for relief fall well within the scope of the State's unambiguous waiver, Defendants' Plea should be rejected and the Court should proceed to resolving the merits of Plaintiffs' petition and application for temporary restraining order and temporary injunction.

## **II. LEGAL STANDARD**

Defendants' distort the relevant standard governing their Plea. While Defendants are correct that the plaintiff generally has the burden to allege facts demonstrating that the trial court has subject matter jurisdiction, *see* Plea at 6 (citing *Tex. Ass'n of Bus. v. Tex. Air Control Bd.*, 852 S.W.2d 440, 446 (Tex. 1993)), in a plea to jurisdiction based on the affirmative defense of sovereign immunity, it is the *defendant* who bears the burden of proving the defense, *i.e.* that the trial court *lacks* jurisdiction. *See Montgomery v. Kennedy*, 669 S.W.2d 309, 310-11 (Tex. 1984); *Welch v. Milton*, 185 S.W.3d 586, 593 (Tex. App. 2006); *see also Green Tree Servicing, LLC v. Woods*, 388 S.W.3d 785, 792 (Tex. App. 2012); *Tex. Dep't of Transp. v. Olivares*, 316 S.W.3d 89, 103 (Tex. App. 2010) (holding, in plea to jurisdiction, defendant must produce evidence that trial court lacks jurisdiction before plaintiff has burden to raise fact issue); *Casso v. Brand*, 776 S.W.2d 551, 556 (Tex. 1989) (burden does not shift to non-movant unless movant establishes defense as matter of law).

In deciding a plea to the jurisdiction, a court may not weigh the merits of the case, but instead must only consider the pleadings and evidence pertinent to the jurisdictional question. *Cty. of Cameron v. Brown*, 80 S.W.3d 549, 555 (Tex. 2002). To that end, at this stage, the Court must credit all evidence favoring the non-movant (here, Plaintiffs) and draw all reasonable inferences in their favor. *City of Houston v. Little Nell Apartments, L.P.*, 424 S.W.3d 640, 646 (Tex. App. 2014). Only if the movants (here, Defendants) discharge their burden must the non-movants present evidence sufficient to raise a material issue of fact regarding jurisdiction. *Tex. Dep't of Parks & Wildlife v. Miranda*, 133 S.W.3d 217, 228 (Tex. 2004). This procedure generally mirrors that of a summary judgment under Texas Rule of Civil Procedure 166a(c), and the burden is on the *Defendants* to meet the summary judgment standard of proof. *Dallas Cty. v. Wadley*, 168 S.W.3d 373, 376-77 (Tex. App. 2005). This standard “protect[s] the plaintiffs from having to ‘put on their case simply to establish jurisdiction.’” *Miranda*, 133 S.W.3d at 228 (quoting *Bland Indep. Sch. Dist. v. Blue*, 34 S.W.3d 547, 554 (Tex. 2000)). For the reasons described below, Defendants cannot meet their burden here.

### **III.** **ARGUMENT**

#### **I. Plaintiffs' Claims Are Not Barred by Sovereign Immunity.**

Plaintiffs' claims are not barred first and foremost because the Election Code provides a clear and express waiver of immunity for Plaintiffs' claims. Specifically, Section 273.081 of the Election Code provides: "A person who is being harmed or is in danger of being harmed by a violation or threatened violation of this code is entitled to appropriate injunctive relief to prevent the violation from continuing or occurring." Tex. Elec. Code § 273.081. Indeed, Texas courts have repeatedly recognized that "the right to enforce the Texas Election Code through injunctive relief under Section 273.081 . . . is a *private right of action* for the protection of private rights." *City of El Paso v. Tom Brown Ministries*, 505 S.W.3d 124, 139 (Tex. App. 2016) (emphasis added) (citing *Osterberg v. Peca*, 12 S.W.3d 31, 48-49 (Tex. 2000)); *see also, e.g., Andrade v. NAACP of Austin*, 345 S.W.3d 1, 17 (Tex. 2011) ("[s]uch suits are essentially private in character and are for the protection of private rights") (brackets in original; citation omitted); *In re Gamble*, 71 S.W.3d 313, 317 (Tex. 2002) ("As is evident, the Legislature has specifically called upon the courts [under Section 273.081] to exercise their equitable powers to resolve election code violations."); *King St. Patriots v. Tex. Democratic Party*, 521 S.W.3d 729, 734 (Tex. 2017) (acknowledging "'the private right of action' in Election Code sections 273.081, 253.131, and 253.132"). This includes actions against the Secretary of

State and other state officials. *See, e.g., Moore v. Morton*, 2012 WL 4341237 (Tex. Dist. Sept. 20, 2012) (granting temporary restraining order against Secretary of State and preventing Secretary from mailing out notices pursuant to Section 273.081); *see also Andrade*, 345 S.W.3d at 17 (acknowledging that Section 273.081 “authorizes injunctive relief” against Secretary of State by private party, but finding plaintiffs lacked standing).

Here, Plaintiffs have alleged that Defendants have threatened to violate the Election Code by releasing Texas voter information to the Commission. *See* Pls. Appl. for TRO and Temp. Inj. (“Appl.”) ¶ 20; Am. Pet. ¶¶ 76-86. In fact, Defendants themselves insist that the “Election Code . . . controls the State’s response to [the Commission’s] request[.]” PTJ at 8. Plaintiffs have further alleged that they are being harmed, or are in danger of being harmed, by the Defendants’ violation of the Election Code (Appl. ¶¶ 17-22), and seek both injunctive and declarative relief to remedy such violation (Am. Pet. at Prayer for Relief, § A). Thus, Plaintiffs are expressly entitled under Section 273.081 to seek injunctive relief to prevent this harm from occurring or continuing. And because Section 273.081 offers a specific statutory waiver to suits against the State and State officers, sovereign immunity does not bar Plaintiffs’ claims.<sup>1</sup>

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<sup>1</sup> The fact that Plaintiffs do not specifically cite Section 273.081 in their petition is irrelevant. In a plea to the jurisdiction challenging plaintiffs’ pleadings, the court looks to the pleaders’ intent, construing the pleadings liberally in favor of

Defendants’ reliance on *Berry v. Texas Democratic Party* is misplaced. *See* Plea at 8 (quoting *Berry*, 449 S.W.3d 633 (Tex. App. 2014)). That case concerned the extent to which sovereign immunity was waived for challenges under an entirely separate section of the Election Code—Section 173.086—concerning the reimbursement of “State funds” for primary-election expenses. Plea at 8 n.3; *see Berry*, 449 S.W.3d at 640-43. Specifically, the *Berry* court held that “sovereign immunity had not been waived for [litigation] expenses that were not included” in a party’s “statement of estimated primary-election expenses.” *Berry*, 449 S.W.3d at 636, 641. That case is inapposite. For one, *Berry* was clearly a suit for money, specifically the reimbursement of litigation expenses the plaintiff political party incurred in connection with litigation challenging redistricting maps. Here, Plaintiffs seek injunctive and declaratory relief, *not* money damages. Moreover, *Berry* had nothing to do with—and therefore did not address—the unambiguous private right of action created by Section 273.081 of the Election Code. It is that provision that “expressly waive[s] the State’s immunity or provide[s] for a private right of action” here. Plea at 8. Sovereign immunity has therefore been expressly waived, and Plaintiffs’ action should move forward.

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plaintiffs—and in favor of jurisdiction. *See Am. Cas. Co. of Reading, Pa. v. Bushman*, 480 S.W.3d 667, 671 (Tex. App. 2015) (citing *Miranda*, 133 S.W.3d at 226).

## **II. Plaintiffs Allege a Valid *Ultra Vires* Suit, Which Cannot Be Disposed of at This Stage.**

Although the express waiver in Section 273.081 is sufficient to defeat the Defendants' Plea, the Plea fails for an additional reason: Plaintiffs' action seeks to determine and protect their rights against State officials alleged in contravention of the Election Code. Texas law has long held that "[t]he acts of officials which are not lawfully authorized are not acts of the State, and an action against the officials by one whose rights have been invaded or violated by such acts, for the determination and protection of his rights, is not a suit against the State" for sovereign immunity purposes. *Cobb v. Harrington*, 190 S.W.2d 709, 712 (Tex. 1945); *see also Humana Ins. Co. v. Texas Health Ins. Risk Pool*, 257 S.W.3d 402, 408 (Tex. App. 2008) ("When a plaintiff merely seeks a declaration of rights pursuant to a statute, such action is not subject to a sovereign immunity defense."). Instead, private parties, like Plaintiffs, may seek declaratory relief against State officials who allegedly act without legal authority, and "[s]uch suits are not considered suits against the State because an attempt to compel a state officer to act within her official capacity does not subject the State to liability." *State v. 1165 Airport Boulevard Office Bldg., Ltd.*, 212 S.W.3d 610, 616 (Tex. App. 2006) (citation omitted).

Here, Plaintiffs seek declaratory and injunctive relief, asserting that their constitutional and statutory rights are at risk of being violated by Defendants'

provision of voter data without complying with Texas law. Thus, because Plaintiffs seek relief against State officials who threatened to act without legal authority, such suits are not suits against the State and do not implicate the sovereign-immunity doctrine. *See Tex. Nat. Res. Conservation Comm'n v. IT-Davy*, 74 S.W.3d 849, 855 (Tex. 2002) (citing *Cobb*, 190 S.W.2d at 712).

Defendants' contention that "Plaintiffs cannot establish that Defendants have committed an *ultra vires* act" is premature and cannot dispose of Plaintiffs' case at this stage. Plea at 9. At this stage, the question is whether Plaintiffs have *alleged* that a State official has acted outside his or her legal authority. *See City of El Paso v. Heinrich*, 284 S.W.3d 366, 372 (Tex. 2009); *Patel v. Texas Dep't of Licensing & Regulation*, 469 S.W.3d 69, 77 (Tex. 2015) (refuting assertion that "claims must be viable on their merits to negate immunity"). If there is a justiciable controversy regarding whether an official has acted beyond her statutory authority, sovereign immunity is not implicated. *See id.* (citing *Federal Sign v. Texas S. Univ.*, 951 S.W.2d 401, 404). That is, if allegations raise a question as to whether State officials acted illegally or *ultra vires*, then a plaintiff must be given the opportunity to test that claim before the court so as to determine the nature of the rights at issue. *See Courtney v. Univ. of Tex. Sys.*, 806 S.W.2d 277, 284-85 (Tex. App. 1991). Here, Plaintiffs have alleged that the provision of voter data in these unique and unprecedented circumstances would violate the Election Code. Defendants' attempt

to conclusively assert, as a basis for sovereign immunity, that they acted within their legal authority is a transparent attempt to address the merits of Plaintiffs' claims and deny Plaintiffs the opportunity to put on their case. Such an argument is improper and without merit at this stage.<sup>2</sup>

**IV.**  
**CONCLUSION**

For the foregoing reasons, the Court should deny Defendants' Plea to the Jurisdiction.

Respectfully submitted,

LAW OFFICE OF CHARLES MCGARRY

/s/ Charles W. McGarry

Charles W. McGarry

Texas Bar No. 13610650

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<sup>2</sup> In any event, for the reasons stated more fully in Plaintiffs' Application for Temporary Restraining Order and Temporary Injunction, Defendants' release of voter data would, in fact, violate state law.

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*(Applications for admission pro hac vice  
forthcoming)*

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of this instrument was delivered to the following attorney of record on this 28<sup>th</sup> day of September, 2017, in accordance with the Texas Rules of Civil Procedure:

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/s/ Charles W. McGarry  
Charles W. McGarry

OCT 03 2017 JC

At 3:38 P.M.  
Velva L. Price, District Clerk

LEAGUE OF WOMEN VOTERS OF TEXAS,  
TEXAS STATE CONFERENCE OF THE  
NATIONAL ASSOCIATION FOR THE  
ADVANCEMENT OF COLORED PEOPLE  
(NAACP) and RUTHANN GEER,

*Plaintiffs,*

vs.

ROLANDO PABLOS, Secretary of State For the  
State of Texas, and KEITH INGRAM, Director,  
Texas Elections Division of the Secretary of State,

*Defendants.*

IN THE DISTRICT COURT

TRAVIS COUNTY, TEXAS

98<sup>th</sup> JUDICIAL DISTRICT

**TEMPORARY RESTRAINING ORDER**

Plaintiffs, the League of Women Voters of Texas, the Texas State Conference of the National Association for the Advancement of Colored People, and Ruthann Geer, have filed an Application for an Temporary Restraining Order and Temporary Injunction in the above-captioned action.

On September 29, 2017, the Court took under consideration Plaintiff's request for a temporary restraining order. After considering the pleadings, briefing, and arguments of counsel, the Court **FINDS** that Defendants Rolando Pablos and Keith Ingram, in their official capacities as Secretary of State for the State of Texas and Director of the Texas Elections Division of the Secretary of State, respectively, may imminently violate Texas Elections Code Section 18.066 and 18.067 and Texas Government Code Section § 552 by transmitting information contained in the Texas Computerized Voter Registration List to the Presidential Advisory Commission on Election Integrity, without taking appropriate precautions to

safeguard the privacy and security of that information. It appears from the facts set forth in Plaintiffs' Second Amended Petition and in the exhibits and sworn affidavits attached to their Application for a Temporary Restraining Order and Temporary Injunction that unless Defendants are immediately restrained from the acts prohibited below, Defendants will commit such acts before a hearing can be held on Plaintiffs' application for a Temporary Injunction. The injury resulting from such acts will be irreparable. If the private information contained in the Texas Computerized Voter Registration List is transmitted without appropriate safeguards, it is likely to become public. The public disclosure of this information without appropriate checks on its use may cause a variety of harms not readily susceptible to monetary measurement, including but not limited to the violation of Plaintiffs' privacy rights, their interests in avoiding commercial solicitation, chilling of their First Amendment rights, and the diminution of their efforts to encourage voting. Having found that Plaintiffs have adequately established, for purposes of obtaining a temporary restraining order, that they have a cause of action and a probable right to relief, and given the potential for immediate and irreparable injury to Plaintiffs, their Application for Temporary Restraining Order is **GRANTED**.

1. **IT IS THEREFORE ORDERED** that Defendants Rolando Pablos and Keith Ingram, their officers, agents, servants, employees, attorneys, and any other persons in active concert or participation with them, shall be restrained from transmitting any data drawn from the below-listed fields of the Texas Computerized Voter Registration List to the Presidential Advisory Commission on Election Integrity, or its members, officers, agents, servants, employees, or attorneys. This order applies to data drawn from the following fields:

- a. COUNTY CODE
- b. PRECINCT
- c. VUID
- d. DOB
- e. PERM HOUSE NUMBER
- f. PERM DESIGNATOR
- g. PERM DIRECTIONAL PREFIX
- h. PERM STREET NAME
- i. PERM STREET TYPE
- j. PERM DIRECTIONAL SUFFIX
- k. PERM UNIT NUMBER
- l. PERM UNIT TYPE
- m. PERM CITY
- n. PERM ZIPCODE
- o. MAILING ADDRESS 1
- p. MAILING ADDRESS 2
- q. MAILING CITY
- r. MAILING STATE
- s. MAILING ZIPCODE

2. **IT IS FURTHER ORDERED** that Defendants Rolando Pablos and Keith Ingram be and hereby are commanded forthwith to comply with this Order from the date of entry until and to the fourteenth (14th) day after entry or until further order of this Court, whichever is less.

3. Plaintiffs shall execute and file with the Clerk of the above-entitled Court a bond to Defendants in the sum of \$ 100<sup>00</sup>. Following the filing of the bond, the Clerk shall issue an Temporary Restraining Order in conformity with the law and the terms of this Order.
4. The Hearing on Plaintiffs' Application for Temporary Injunction is hereby set for hearing on the central docket the 16<sup>th</sup> day of October, 2017 at 9:00 o'clock a.m in the courtroom assigned by the Travis County Court Administrator in the Herman Marion Sweatt Travis County Courthouse in Austin, Texas.

SIGNED this 3<sup>rd</sup> day of October, 2017 at 11:15 o'clock a.m.



---

TIM SULAK  
JUDGE PRESIDING



DISTRICT CLERK, TRAVIS COUNTY TEXAS - GENERAL/GOVT DIVISION  
VELVA L. PRICE

RECEIPT #: G 000081833  
RECEIVED OF: MCGARRY CHARLES W  
PART. ID: 1029150  
BY CLERK: RODRIGUEZ NANCY  
CHECKS:

DATE: 10-03-2017

TIME: 15:52:05  
MEMO:

CASH	CREDIT	CHANGE	OTHER
\$20.00	\$0.00	\$0.00	\$0.00

CASE NUMBER	EVENT	COURT/JUDGE	TAX NO.	AMOUNT
D-1-GN-17-003451 LEAGUE OF WOMEN V PABLOS ET AL PARTY: LEAGUE OF WOMEN VOTERS OF TEXAS	526	PMT:APPROVAL OF BOND		\$4.00
D-1-GN-17-003451 LEAGUE OF WOMEN V PABLOS ET AL PARTY: LEAGUE OF WOMEN VOTERS OF TEXAS	310	PMT:TRO ISSUANCE		\$16.00
TOTAL RECEIPT...				\$20.00

PLEASE KEEP THIS RECIEPT FOR YOUR RECORDS  
STREET ADDRESS: 1000 GUADALUPE, SUITE 302 AUSTIN, TX 78701  
MAILING ADDRESS: P.O. BOX 679003 AUSTIN, TX 78767-9003



DISTRICT CLERK, TRAVIS COUNTY, TEXAS - CASH BONDS  
VELVA L. PRICE

RECEIPT #: B 000013293      DATE: 10-03-2017  
RECEIVED OF: LEAGUE OF WOMEN VOTERS OF TEXA  
PART. ID: 3582313  
BY CLERK: CLINT  
CHECKS:

TIME: 15:43:02  
MEMO:

BOND ID: 000108133

CASH	CREDIT	CHANGE	OTHER
\$100.00	\$0.00	\$0.00	\$0.00

CASE NUMBER	EVENT	COURT/JUDGE	TAX NO.	AMOUNT
D-1-GN-17-003451 LEAGUE OF WOMEN V PABLOS ET AL PARTY: LEAGUE OF WOMEN VOTERS OF TEXAS	547	PMT:TRO CASH BOND		\$100.00
TOTAL RECEIPT...				\$100.00

PLEASE KEEP THIS RECEIPT FOR YOUR RECORDS  
STREET ADDRESS:      MAILING ADDRESS:  
1000 GUADALUPE, SUITE 302      P.O. BOX 679003  
AUSTIN, TX 78701      AUSTIN, TX 78767-9003