

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)

UNITED STATES OF AMERICA,

Plaintiff,

TEXAS LEAGUE OF YOUNG VOTERS
EDUCATION FUND, *et al.*,

Plaintiff-Intervenors,

TEXAS ASSOCIATION OF HISPANIC
COUNTY JUDGES AND COUNTY
COMMISSIONERS, *et al.*,

Plaintiff-Intervenors,

v.

STATE OF TEXAS, *et al.*,

Defendants.

Civil Action No. 2:13-cv-263 (NGR)

TEXAS STATE CONFERENCE OF NAACP
BRANCHES, *et al.*,

Plaintiffs,

v.

NANDITA BERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-291 (NGR)

BELINDA ORTIZ, *et al.*,

Plaintiffs,

v.

STATE OF TEXAS, *et al.*,

Defendants

Civil Action No. 2:13-cv-348 (NGR)

DECLARATION OF JANE HENRICI

Pursuant to 28 U.S.C. § 1746, I, Jane Henrici, make the following declaration:

I. Statement of Inquiry

1. I have been asked by attorneys with the U.S. Department of Justice to present evidence from social science research to assist the court in determining whether low-income Texans face increased burdens when attempting to obtain photo identification as authorized by Senate Bill 14 (SB 14) and, because the majority of Texans living in poverty are black and Hispanic, whether low-income blacks and Hispanics are disproportionately burdened by this law. I have been compensated at \$200 per hour for my work, and have reviewed studies of poverty in Texas, some of which I authored or co-authored, and examined additional data, including from the U.S. Census, to assess circumstances faced by low-income members of racial and ethnic minorities in Texas.

2. I have reached the following conclusion: poorer Texans who are registered voters or eligible to register to vote but do not possess photo identification acceptable under SB 14 face multiple obstacles in obtaining such documentation relative to Texans with higher income levels. Poorer Texans who are black and Hispanic are more likely than those who are white to have unreliable incomes, live in relative social and economic isolation, have health problems that limit mobility, and face stigmas associated with their poverty—which compounds and worsens difficulties securing authorized photo identification in order to vote. The law disproportionately burdens low-income black and Hispanic Texans.

II. Background and Qualifications

3. I am an anthropologist with twenty years of professional field research, policy analysis, publication, and university level teaching experience. I am an Independent Consultant, Senior Research Affiliate with the Institute for Women's Policy Research, and Professorial Lecturer at George Washington University.

4. I specialize in issues of poverty as they affect gender, racial and ethnic groups, and those with special needs such as the elderly and those with disabilities. I focus in my research, teaching, and consulting on methods to improve opportunities and reduce obstacles that unequally affect various groups and communities. I have conducted and directed others in conducting quantitative and qualitative research in the United States, Latin America, and the Middle East and North Africa.

5. I obtained my doctorate in anthropology at The University of Texas at Austin in 1996, my Master's degree at the University of Chicago in 1981, and graduated with my Bachelor's from the University of Texas at Austin *Cum Laude* in 1979 with three semesters at Southern Methodist University 1976–1977.

6. After completing my doctoral dissertation field research in Peru, I was contracted as a qualitative ethnographic researcher on different projects to gather and analyze information concerning race, ethnicity, and experiences of poverty and marginalization in Texas. I conducted research for these projects in Laredo, Palestine, and various communities south of Austin.

7. After obtaining my doctorate, I was selected to be a Postdoctoral Research Fellow 1998–2000 at the University of Texas at Austin for "Welfare,

Children, and Families: A Three-City Study,” a large-scale, longitudinal, and mixed method research project on the consequences of welfare policy changes begun nationally in 1996 (in Texas, in 1995) on households, neighborhoods, and government and nonprofit agencies in Boston, Chicago, and San Antonio.

8. Subsequent to my fellowship, I was hired full-time as a research scientist on the project 2000-2001, and continued during the summers of 2002 and 2003 as a subcontractor. More about my work on this study is described in my CV, provided as an appendix to this report.

9. I taught for seven years in the Anthropology Department at the University of Memphis. In 2008, I left that teaching position to join the Institute of Women’s Policy Research, contracted to direct a long-term study of the ongoing conditions of 184 low-income African American women, former tenants of public housing, displaced by the flooding of New Orleans in the aftermath of Hurricane Katrina. We conducted interviews for this study in the womens’ homes post-Katrina in New Orleans and Baton Rouge, Louisiana and Houston, Texas.

10. Additional professional research and analysis experience in Texas that I have done includes qualitative projects dealing with food stamp use in rural and urban areas of central Texas and with minority math and science elementary school education in Laredo, Texas.

11. Policy changes I have studied in Texas include, but are not limited to, the adoption of weekly work hour and parenting class requirements along with 60-month/5 year lifetime limits for cash welfare receipt; the delinking of cash benefits from medical coverage; the imposition of sanctions on benefits recipients in the

form of cutting their child care subsidy, cash assistance, or food stamps for violations such as unreported asset ownership or missed meetings with caseworkers; the state-adopted gender-based violence waivers on work requirements; the mass reductions to professional benefits and employment caseworker staffing; the contracting of nonprofits for job training programming; and the demolitions of traditional public housing stock.

12. For all of these projects in Texas (1991-2013), I spent substantial interview and observation hours within the homes, recreational facilities, schools, stores, churches, child care centers, and social services benefits offices of the participating low-income families. In addition, I interviewed elementary school teachers in Laredo, and benefits caseworkers, religious leaders, political representatives, child care providers, and neighborhood organization administrators in San Antonio. For my research in Laredo, I lived with two families, for a period of three-months each (October - December 1991 and January - March 1992), in their homes located in the low-income Hispanic neighborhoods where our respondents were concentrated.

13. I have authored and co-authored reports and publications including books, book chapters, evaluations, and policy recommendations; prepared grant proposals and legislative, media, and other communication; served on doctoral, peer-publication, and grant proposal review committees; delivered invited academic and public lectures and consulted internationally and domestically on issues of disparity and development; and mentored students and junior researchers.

14. My edited volume, *Doing Without: Women and Work after Welfare Reform* (2006), and the book I co-authored with Ronald Angel and Laura Lein, *Poor Families in America's Health Care Crisis* (2006), have received honors and citations and application in university coursework. My recent publications include "Doubly Displaced: Women, Public Housing, and Spatial Analysis after Katrina," (with Allison Suppan Helmuth and Angela Carlberg) in *The Women of Katrina: How Gender, Race, and Class Matter in an American Disaster*.

15. I have received multiple awards and honors, including a Fulbright Scholar Award, and have been elected multiple times to international professional offices.

16. I am regularly asked to speak on and advise regarding ways to address issues of poverty and barriers confronted by lower-income individuals, particularly women of racial and ethnic minorities and those who have health and disability challenges.

17. I am considered an expert in qualitative methods and in the integrated use of quantitative and qualitative methods of research (generally known as a mixed method approach). I do technical consulting and training in both, and am the regular instructor for the graduate course for the Elliott School of International Affairs at George Washington University in mixed methods.

III. Sources of Information

18. For this report, I reviewed scholarly literature regarding the use of documents, including those necessary to obtain government services and benefits,

by low-income minority citizens and particularly those living in Texas. I also examined demographic data concerning minorities and poverty in Texas, and reviewed all interview data from the two large-scale longitudinal projects in which I have conducted research in Texas.

19. This mixed method approach to data collection and analysis has increasingly become regarded by policy experts as superior to either quantitative or qualitative alone for large-scale and in-depth examinations of lower income households and populations¹ as well as “street level” implementation of legislation and policy.² In particular, mixed method approaches are valued for assessing issues of poverty and economic development among diverse racial and ethnic groups.³

¹ Donna M. Mertens, Katrina L. Bledsoe, Martin Sullivan, and Amy Wilson. “Utilization of Mixed Methods for Transformative Purposes,” In Abbas Tashakkori and Charles Teddlie (eds.), *SAGE Handbook of Mixed Methods in Social & Behavioral Research*, 2nd Edition, pp. 193 – 214 (Thousand Oaks, CA: SAGE Publications, 2010).

² Evelyn Z. Brodtkin. “Accountability in Street-Level Organizations,” *International Journal of Public Administration*. 31: 317 – 336 (2008).

³ Kathryn Edin and Laura Lein. *Making Ends Meet: How Single Mothers Survive Welfare and Low-Wage Work* (New York, NY: Russell Sage Foundation, 1997); Frank Munger (ed.), *Laboring Below the Line: The New Ethnography of Poverty, Low-Wage Work, and Survival in the Global Economy* (New York, NY: Russell Sage Foundation, 2002); Steve Olson (ed.) *Toward an Integrated Science of Research on Families* (Washington, DC: Committee on the Science of Research on Families, Board on Children, Youth, and Families, Institute of Medicine and National Research Council of the National Academies, 2011); Susan J. Popkin, Laura E. Harris, and Mary K. Cunningham. *Families in Transition: A Qualitative Analysis of the MTO Experience, Final Report* (Washington, DC: U.S. Department of Housing and Urban Development, Office of Policy Development and Research and Abt Associates, Inc., 2002); Martín Sánchez-Jankowski. *Cracks in the Pavement: Social Change and Resilience in Poor Neighborhoods*. (Berkeley, CA: University of California Press, 2008); U.S. Department of Housing and Urban Development. “Mixed-Income Community Dynamics: Five Insights from Ethnography,” *Evidence Matters* (Spring, 2013); William Julius Wilson. *When Work Disappears: The World of the New Urban Poor* (New York, NY: Knopf

This preference for mixed methods research comes from a long history of evaluating social science focused on poverty, and efforts to address it.⁴ The principal reason for this preference is that, while survey data box in responses regarding human experiences, qualitative data open up explanations and provide in-depth information for those responses.⁵ Moreover, within analyses and reporting of qualitative data, descriptive accounts of individual human experiences and views in the form of vignettes are valid and standard components.⁶

20. I also reviewed for this report the texts of SB 14, the Texas Administrative Regulations related to Election Identification Certificates and the following websites of the Texas Secretary of State and Texas Department of Public Safety (DPS): www.votetexas.gov, www.txdps.state.tx.us/DriverLicense, and <http://www.txdps.state.tx.us/driverlicense/electionid.htm> as well as the version in Spanish of this last site, available through a link to an automatically generated Google translation.⁷ In addition, I reviewed the expert report of Dr. Steven

Doubleday Publishing Group, 1996) and *More than Just Race: Being Black and Poor in the Inner City* (New York, NY: W.W. Norton and Company, 2010).

⁴ Alice O'Connor. *Poverty Knowledge: Social Science, Social Policy, and the Poor in Twentieth-Century U.S. History* (Princeton, NJ: Princeton University Press, 2001).

⁵ Donna M. Mertens, Katrina L. Bledsoe, Martin Sullivan, and Amy Wilson. "Utilization of Mixed Methods for Transformative Purposes," In Abbas Tashakkori and Charles Teddlie (eds.), *SAGE Handbook of Mixed Methods in Social & Behavioral Research, 2nd Edition*, pp. 193 – 214 (Thousand Oaks, CA: SAGE Publications, 2010).

⁶ Margaret D. LeCompte and Jean J. Schensul. *Analysis and Interpretation of Ethnographic Data: A Mixed Methods Approach, 2nd Edition*, pp. 269 - 275 (Lanham, MD: AltaMira Press, 2013).

⁷

<http://translate.google.com/translate?depth=1&hl=en&rurl=translate.google.com&>

Ansola be here on the number and racial make-up of Texas voters who lack state or federal photo identification.

21. SB 14 requires that a voter in Texas present one of seven forms of government-issued photo identification for verification at a polling station before being allowed to vote on site. The government-issued photo documentation, other than a citizenship certificate, must be current or have expired within 60 days of being presented. If voting by mail, no photo identification is required.

22. The Texas Secretary of State website lists the seven acceptable forms of photo identification. If a currently registered voter in Texas lacks all seven valid forms of photo identification, and has not obtained a disability exemption, the voter can cast a provisional ballot. For such a provisional ballot to be counted a voter must show one of the required forms of photo identification to the county registrar within six calendar days of the election, except in circumstances that involve voters who have religious objections to being photographed or who lost their identification as a result of a natural disaster.

23. To obtain a disability exemption/exception, adult voters (or their legal guardians) must supply written documentation from either the U.S. Social Security Administration or the U.S. Department of Veteran's Affairs confirming the disability determination and, for veterans, at least 50 percent impairment, along with a statement that the voter lacks any one of the allowable government-issued photo identifications.

[sl=en&tl=es&twu=1&u=http://www.txdps.state.tx.us/DriverLicense/electionID.htm](http://www.txdps.state.tx.us/DriverLicense/electionID.htm).

24. In order to vote by mail, and thus not be required to show an authorized photo identification, a voter must be 65 years or older, disabled, out of the county on election day and during the period of early voting, or confined in jail but otherwise eligible. In addition, the person must submit to the proper early voting clerk a completed and signed application between the 60th to 9th day, or 11th if election day falls on a Tuesday, before election day or deliver the application before early voting in person begins.

25. Those who otherwise lack one of the specified forms of photo identification may apply for a Texas Election Identification Certificate (EIC) that, if issued, will be valid for six years (although EICs for citizens 70 years old and over do not expire). An EIC may be used only for voting, and can be issued through submission of an application and supporting documents at a DPS office, an EIC Mobile Station, or a designated county office in select counties that do not contain a DPS office. To get an EIC, a person needs to 1) go to the appropriate office during open hours, 2) complete and verify the application form (DL-14C) affirming that s/he lacks all other forms of qualifying identification under SB 14, 3) submit documentation as listed below, 4) have the application form notarized or signed by an authorized officer of the State of Texas, and 5) have a photograph taken.

26. According to the Texas Secretary of State website, an applicant must show a current voter registration card or be eligible to vote and submit a voter registration application. Moreover, according to the DPS website, EIC applicants must show documentary proof of U.S. citizenship and of identity.

27. According to the DPS website, proof of citizenship for obtaining an EIC requires an (expired) U.S. passport book or card; an original or certified birth certificate from a U.S. state, territory, or District of Columbia or authorized Report of Birth issued by the U.S. Department of State; a Citizen or Citizen Resident Identification Card issued by the U.S. Department of Justice Immigration and Naturalization Service;⁸ or a certificate of U.S. citizenship or naturalization.⁹

28. Proof of identity documentation for an EIC must be: one piece of “primary” identification; two “secondary” pieces of identification; or one secondary plus two “supporting” pieces of identification. Primary identification must be either a Texas driver license or an authorized personal identification card expired for over 60 days and within two years. Secondary identification has to be a federal, state, U.S. territory, or the District of Columbia government-issued and recorded original or certified copy of: a birth certificate, court order with name and date of birth showing official name and/or gender change, or U.S. citizenship or naturalization papers without photo identification. Supporting pieces include, but are not limited to, a voter registration card; school or military record; a U.S. Social Security Card; Form W-2 or 1099; Medicaid or Medicare card; parole or mandatory release certificate or offender identification card issued by the Texas Department of Criminal Justice; Texas driver license or personal identification expired more than two years; and an

⁸ U.S. Citizen and Resident Citizen ID cards, Forms I-197 and I-179 respectively, remain valid although are no longer issued.

⁹ These certificates are issued by the U.S. Department of Homeland Security Citizenship and Immigration Services.

unexpired or expired within two years driver license from another U.S. state, territory, or District of Columbia.

29. In other words, to secure and use an EIC, a person must first register to vote, take the time to learn what is required and gather or obtain copies of the necessary documentation, find a way to get to a location where EICs are being issued during the hours that the office is open, wait at that location for whatever time necessary in order to be served, complete and verify the EIC application, and bring the EIC at the time of voting.

30. Large numbers of low-income black and Hispanic Texans are able to get by in their daily lives without photo identification. Research performed by Dr. Steven Ansolabehere for this litigation found that approximately 1.2 million registered voters in Texas lack an accepted form of federal or state photo identification as required by SB 14, and black and Hispanic voters are more likely to lack photo identification than white voters. According to Dr. Ansolabehere's report, black voters are roughly twice as likely as non-Hispanic white voters to lack authorized photo identification, and Hispanic voters are significantly more likely to lack photo identification as well.

31. As I will describe, low-income Texans experience difficulties obtaining, keeping, replacing, and renewing government-issued documents such as vouchers, certificates, licenses, records, and cards—and the majority of low-income Texans are black and Hispanic. As Dr. Ansolabehere's research shows, black and Hispanic Texans are more likely to not already have a current and, as authorized by SB 14, appropriate form of photo identification. Low-income Texan voters who do

not already have photo identification as required by SB 14 will find getting one to be a burden, and this is a burden that disproportionately impacts minorities in Texas.

IV. Poverty, Race and Ethnicity, and Photo Identification in Texas

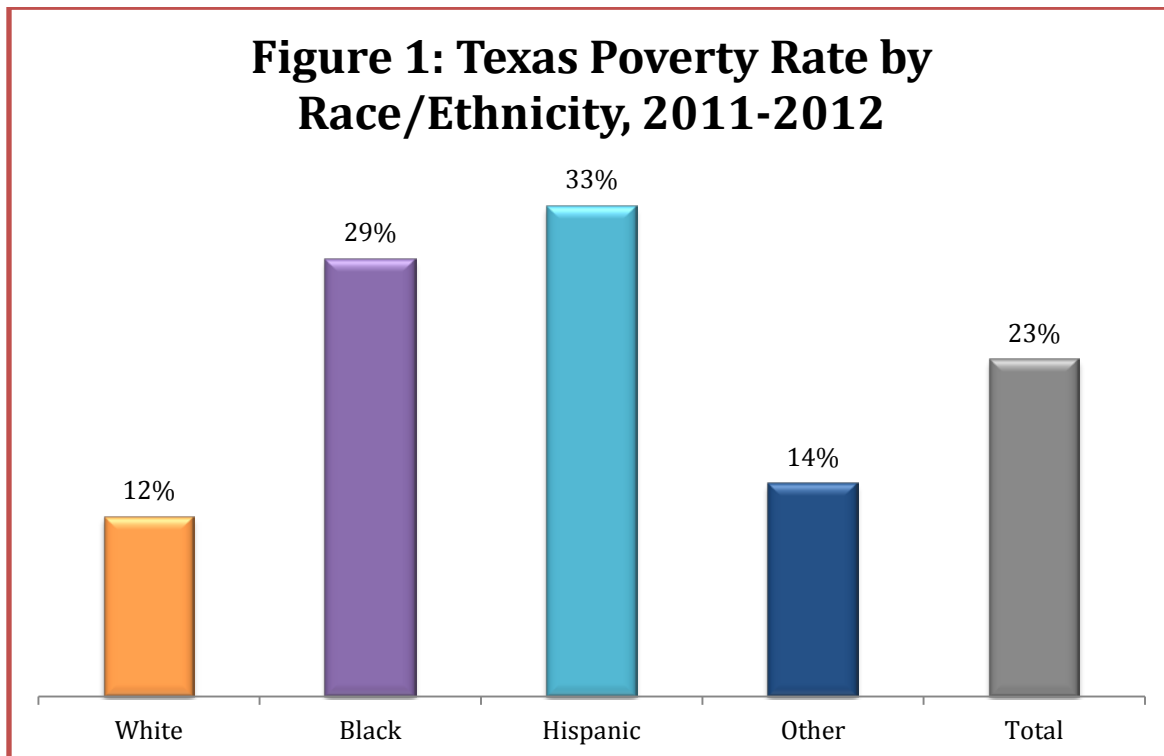
32. Poorer Texans will have significant difficulty getting photo identification if they do not have one already, and blacks and Hispanics are disproportionately represented among Texans living in poverty. In Texas, poverty is strongly associated with race and ethnicity, and conditions in which poorer minorities live and work in Texas affect their ability to obtain and update government-issued forms of documentation.

33. Further, as I will describe in the following sections, poorer blacks and Hispanics are more likely than other Texans to have unreliable incomes, live in relative social and economic isolation, have health issues that limit mobility, and face stigmas associated with their poverty. These problems interact with one another and make getting and keeping current photo identification as authorized by SB 14 a burden for poorer African-American and Hispanic Texans not already in possession of one.

34. According to a 2014 analysis¹⁰ of the most recent income levels from the U.S. Census Bureau Current Population Survey for Texas (2011-2012), roughly one-fourth (23 percent) of the state population lives at and below 100 percent of the Federal Poverty Level, as defined by the U.S. Department of Health and Human Services. This poverty is spread unevenly across Texas among those of different race

¹⁰ The Kaiser Family Foundation. *State Health Facts* (2014). <http://kff.org/statedata/>.

and ethnic groups. Using the U.S. Census categories for race and ethnic groups, the percentage of whites (12 percent) who live in poverty is less than half that of blacks (29 percent) or Hispanics of any race (33 percent) in Texas. In contrast, the percentage of all other races and ethnic groups in Texas who live at that level of poverty (14 percent) is closer to that of whites (Figure 1).



Source: Urban Institute and Kaiser Commission on Medicaid and the Uninsured estimates based on the Census Bureau's March 2012 and 2013 Current Population Survey (Annual Social and Economic Supplements).

Unreliable Income Burdens

35. Among Texans in poverty, income is not only low, but unreliable. The lack of a consistent and reliable income affects the decisions that poorer blacks and

Hispanics, the majority of poorer Texans, must make regarding their time expenditure, transportation use, residential location, and health care.

36. Most of the job opportunities that poorer Texans can find pay relatively low hourly wages and have few if any accompanying benefits. To earn an income sufficient to shelter and feed an adult, much less a family, even in less expensive parts of Texas often requires multiple jobs. In addition, many jobs are only part-time or temporary, sometimes seasonal, and lack the option for the employee to have a regular schedule: these conditions also make income unsteady.¹¹ Multiple jobs combined with irregular hours of employment make planning for appointments or meetings outside of work, particularly during open office hours, problematic¹²—and that will include the scheduling necessary to obtain photo identification authorized by SB 14.

¹¹ Ronald Angel, Laura Lein, and Jane Henrici. *Poor Families in America's Health Care Crisis: How the Other Half Pays*, pp. 101 – 128 (New York: Cambridge University Press, 2006); Beth Bruinsma. “Flexible Families: Low-Income Women Negotiating Employment Opportunities, Wages, and Child Care Needs in San Antonio,” in Jane Henrici (ed.) *Doing Without: Women and Work after Welfare Reform*, pp. 40 – 63 (Tucson, AZ: University of Arizona, 2006); Jane Henrici, Allison Suppan Helmuth and Angela Carlberg. “Doubly Displaced: Women, Public Housing, and Spatial Analysis after Katrina,” in Emmanuel David and Elaine Enarson (eds.), *The Women of Katrina: How Gender, Race, and Class Matter in an American Disaster*, pp. 142 – 154 (Nashville, TN: Vanderbilt University, 2012); Jane Henrici and E. Carol Miller. “Work First, Then What? Women and Job Training after Welfare Reform,” in Jane Henrici (ed.) *Doing Without: Women and Work after Welfare Reform*, pp. 64 – 80 (Tucson, AZ: University of Arizona, 2006); Deanna Schexnayder et al. *Texas Families in Transition/Surviving without TANF: An Analysis of Families Diverted from or Leaving TANF*, pp. 67, 91, and 109 (Austin, TX: Ray Marshall Center for the Study of Human Resources, the University of Texas at Austin and the Center for Innovative Projects for Economic Development, Prairie View A&M University, 2002).

¹² Holly Bell. “Putting Mothers to Work: Caseworkers’ Perceptions of Low-Income Women’s Roles in the Context of Welfare Reform,” in Jane Henrici (ed.), *Doing*

37. Moreover, as a result of their unreliable incomes, low-income Texans do not always have access to credit and to formal financial services such as checking accounts. Relying on cash loans through friends and family and check cashing through local stores increases income instability. At the same time, relying on such transactions can allow those Texans to get by without the forms of photo identification that regular banking might demand—and that SB 14 requires.¹³

38. Finally, unreliable and irregular wage work and other income also affect the cost of taking the time to locate and bring the requisite papers and identity cards, travel to a processing site, wait through the assessment, and get photo identification. This is because most job opportunities do not include paid sick or other paid leave; taking off from work means lost income. Employed low-income Texans not already in possession of such documents will struggle to afford income loss from the unpaid time needed to get photo identification.

39. In fact, the time expenditure needed for obtaining a record or form of identification can be of questionable benefit and significant risk to a low-income person in Texas, unless that expenditure is clearly aimed toward the betterment of a child. While low-income women and men living in Texas will add, sometimes significantly, to their own hardships and risks in their effort to cover costs that could help their children, poorer minority adults are often reluctant to invest time

Without: Women and Work after Welfare Reform, pp. 155 – 171 (Tucson, AZ: University of Arizona, 2006).

¹³ Laura Lein, Alan Benjamin, Monica McManus, and Kevin Roy. “Without a Net, Without a Job: What’s a Mother to Do?,” in Jane Henrici (ed.), *Doing Without: Women and Work after Welfare Reform*, pp. 23 - 39 (Tucson, AZ: University of Arizona, 2006).

and other resources into tasks not directly related to that sort of outcome or objective.¹⁴

Isolation Burdens

40. Related to their unreliable incomes, poorer Texans face troubles both in getting around and in finding a place to stay. Social and physical isolation related to transportation and housing issues interact with other problems to present a barrier that low-income black and Hispanic Texans in particular face in securing photo identification acceptable under SB 14.

41. The majority of the blacks and Hispanics living in poverty about whom I have conducted research across Texas either walk and, where buses are available, take a bus or series of buses to get around. Most respondents are not car owners; those who own vehicles often own ones that fail to run reliably.¹⁵ Thus, poorer minority Texans might not need to possess or renew a Texas driver license

¹⁴ Beth Bruinsma. "Flexible Families: Low-Income Women Negotiating Employment Opportunities, Wages, and Child Care Needs in San Antonio," in Jane Henrici (ed.) *Doing Without: Women and Work after Welfare Reform*, pp. 40 – 63 (Tucson, AZ: University of Arizona, 2006); Jane Henrici, Allison Suppan Helmuth and Angela Carlberg. "Doubly Displaced: Women, Public Housing, and Spatial Analysis after Katrina," in Emmanuel David and Elaine Enarson (eds.), *The Women of Katrina: How Gender, Race, and Class Matter in an American Disaster*, pp. 142 – 154 (Nashville, TN: Vanderbilt University, 2012); Debra Skinner, William Lachicotte, and Linda Burton. "The Difference Disability Makes: Managing Childhood Disability, Poverty, and Work," in Jane Henrici (ed.), *Doing Without: Women and Work after Welfare Reform*, pp. 113 – 130 (Tucson, AZ: University of Arizona, 2006).

¹⁵ Ronald Angel, Laura Lein, and Jane Henrici. *Poor Families in America's Health Care Crisis: How the Other Half Pays*, pp. 79 – 100 (New York: Cambridge University Press, 2006); Jane Henrici, Allison Suppan Helmuth and Angela Carlberg. "Doubly Displaced: Women, Public Housing, and Spatial Analysis after Katrina," in Emmanuel David and Elaine Enarson (eds.), *The Women of Katrina: How Gender, Race, and Class Matter in an American Disaster*, pp. 142 – 154 (Nashville, TN: Vanderbilt University, 2012).

and, as will be discussed below, face mobility and other challenges that affect getting an EIC.

42. Low-income Texans give several reasons for either not owning a vehicle or keeping one in working order. Based on our research with primarily black and Hispanic poorer families in San Antonio, my co-authors and I observe that, “Ownership of a car often represents a burden as much as a useful asset.”¹⁶ Reasons include: 1) unless an auto is given to them or the resources for it provided, households in poverty lack the money to purchase, maintain, and insure a car;¹⁷ and 2) poorer black or Hispanic Texans are disproportionately likely, even relative to other poorer Texans, to have grown up in or near a traditional-style public housing development that was within walking distance of services, schools, stores, and buses or collective transit. These families learned to survive without owning a car.¹⁸

43. A study of overall transportation expenditures among poor in the United States based on research in California found that low-income families often employ complicated strategies in order to afford even minimal mobility. These

¹⁶ Ronald Angel, Laura Lein, and Jane Henrici. *Poor Families in America’s Health Care Crisis: How the Other Half Pays*, p. 96 (New York: Cambridge University Press, 2006).

¹⁷ Laura Lein, Alan Benjamin, Monica McManus, and Kevin Roy. “Without a Net, Without a Job: What’s a Mother to Do?” in Jane Henrici (ed.) *Doing Without: Women and Work after Welfare Reform*, pp. 23 – 39 (Tucson, AZ: University of Arizona, 2006).

¹⁸ Ronald Angel, Laura Lein, and Jane Henrici. *Poor Families in America’s Health Care Crisis: How the Other Half Pays*, pp. 139 – 146 (New York: Cambridge University Press, 2006); Jane Henrici, Allison Suppan Helmuth and Angela Carlberg. “Doubly Displaced: Women, Public Housing, and Spatial Analysis after Katrina,” in Emmanuel David and Elaine Enarson (eds.), *The Women of Katrina: How Gender, Race, and Class Matter in an American Disaster*, pp. 142 – 154 (Nashville, TN: Vanderbilt University, 2012).

adaptations can include deliberately limiting travel to shorter distances and less frequent trips. However, even after doing their best to strategize, poorer households still sometimes have to sacrifice other critical items in their budget—including food—in order to cover transportation costs.¹⁹

44. Some Texan families also forgo vehicle ownership to avoid undercutting access to means-tested benefits. Many low-income Texans worry they might need to use supplemental assistance in the future, even if they have not used it in the past, whether this means subsidized child care, food stamps, subsidized health coverage, or temporary cash welfare (which, in order to obtain, requires demonstrating at least part-time work). Texans living in poverty might go through phases of receiving and not receiving benefits depending on other circumstances in their lives, such as employment and health. A study of both survey and state administrative data concerning low-income Texans shows, however, that the effort required to seek out and obtain such help in Texas can be discouraging. Black and Hispanic Texans in particular tend to seek cash welfare only in a situation of unemployment. (Conversely, when employed, black and Hispanic low-income Texans are more likely than low-income white Texans to leave the welfare rolls.)²⁰

¹⁹ Asha Weinstein Agrawal et al. *Getting Around When You're Just Getting By: The Travel Behavior and Transportation Expenditures of Low-Income Adults*, MTI Report 10-02 (San José, CA: Mineta Transportation Institute, San José State University, 2011).

²⁰ Deanna Schexnayder et al. *Texas Families in Transition/Surviving without TANF: An Analysis of Families Diverted from or Leaving TANF*, pp. 91 and 109 (Austin, TX: Ray Marshall Center for the Study of Human Resources, the University of Texas at Austin and the Center for Innovative Projects for Economic Development, Prairie View A&M University, 2002).

One of the stipulations for determining eligibility to receive certain types of supplemental assistance is asset ownership; as a result, some poorer Texans concerned about seeking help at some point,²¹ such as through Medicaid,²² do not own a car.

45. In other words, because of unreliable income burdens, and the problems and costs associated with car ownership, there are poorer black and Hispanic Texans who are getting by without owning a vehicle.²³

46. At the same time, while a portion of poorer minority Texans are getting by without a car, doing so is difficult and itself an obstacle to improving their lives. Public transit in Texas is not an adequate substitute for private vehicle ownership,²⁴ and lack of reliable transportation affects poorer Texans' employment

²¹ Ronald Angel, Laura Lein, and Jane Henrici. *Poor Families in America's Health Care Crisis: How the Other Half Pays*, p. 96 (New York: Cambridge University Press, 2006); Jane Henrici, Allison S. Helmuth, Frances Zlotnick, and Jeff Hayes. *Women in Poverty During the Great Recession: Public Benefits Do Not Always Respond to Rising Need, Variation Across States is Substantial*, p. 2 (Washington, DC: Institute for Women's Policy Research, 2010).

²² Although Texas does not require families to provide proof of assets when determining children's eligibility for Medicaid or the Children's Health Insurance Program (CHIP), the state may do so for adults in a household without a dependent, disabled, or elderly member. ("Texas Medicaid and CHIP Programs," Georgetown University Health Policy Institute Center for Children and Families," <http://ccf.georgetown.edu/programs/tx-mcp/>).

²³ Deanna Schexnayder et al. *Texas Families in Transition/Surviving without TANF: An Analysis of Families Diverted from or Leaving TANF*, p. 57 (Austin, TX: Ray Marshall Center for the Study of Human Resources, the University of Texas at Austin and the Center for Innovative Projects for Economic Development, Prairie View A&M University, 2002).

²⁴ Cf. Tricia Ann Barrow. "An Examination of Urban Public Transportation Equity in San Antonio, Texas," M.S. Report (Austin, TX: Department of Community and Regional Planning, the University of Texas at Austin, 2009).

opportunities and thus their already unsteady incomes. In the statewide study of poorer Texans mentioned earlier, respondents reported “transportation problems” as the second most common reason after “child care problems” for not having a job. Over two-thirds (68 percent) of respondents who had left welfare but remained unemployed said they lacked fully reliable transportation. Further, the issue varies by race and ethnicity among poorer Texans: white unemployed respondents were more likely to have use of a private and reliable vehicle than either Hispanics or blacks, while blacks were far more likely to suffer unemployment because of a lack of transportation than Hispanics or whites.²⁵

47. Relying on others who own cars for rides to centers where authorized photo identification can be made might not be an option either. Geographic distances in rural and small-town Texas form one obstacle, yet distances in urban areas of Texas can pose a problem as well. In part as a result of housing reform policy and the demolition of the preponderance of public housing during the mid-1990s-2000s, a portion of poorer families making use of housing assistance have been scattered across Texas cities.²⁶ In addition, when unable to make regular rent and utility payments due to irregular employment and limited access to credit or loans, poorer Texans often abruptly relocate or experience eviction without warning

²⁵ *Ibid.* pp. 56 – 60.

²⁶ Bruce Katz. “The Origins of HOPE VI,” In *From Despair to HOPE: HOPE VI and the New Promise of Public Housing in America’s Cities*, Henry G. Cisneros and Lora Engdahl (eds.), pp. 15 – 30 (Washington, DC: Brookings Institution Press, 2009); Lillian M. Salcido. “Looking for Home,” in Jane Henrici (ed.), *Doing Without: Women and Work after Welfare Reform*, pp. 83 – 98 (Tucson, AZ: University of Arizona, 2006).

and get cut off from telephone and internet communication with others.²⁷ Many low-income Hispanic and black families in particular have moved out of or been displaced from their former neighborhoods. As I found in my research, changes and challenges to housing and communication among low-income minorities across Texas mean that members of extended families often no longer are able to remain near one another and help one another out (whether with transportation, shelter, child care, or loans).²⁸

48. Lack of reliable employment, housing, transportation, and assistance with these resources from either informal or formal systems create another aspect of social and economic isolation that especially affects poorer minority Texans who do not own cars: affording the necessary time to deal with issues that arise in daily life. Across much of Texas, either walking or taking a bus can cost hours in travel time to go to and from a child care center, work site, school registrar's office, employment office, doctor's office, or government agency—whether as part of a

²⁷ Ronald Angel, Laura Lein, and Jane Henrici. *Poor Families in America's Health Care Crisis: How the Other Half Pays*, pp. 10 – 12 (New York: Cambridge University Press, 2006).

²⁸ *Ibid.* p. 6; Jane Henrici, Allison Suppan Helmuth and Angela Carlberg. “Doubly Displaced: Women, Public Housing, and Spatial Analysis after Katrina,” in Emmanuel David and Elaine Enarson (eds.), *The Women of Katrina: How Gender, Race, and Class Matter in an American Disaster*, pp. 142 – 154 (Nashville, TN: Vanderbilt University, 2012); Lillian M. Salcido. “Looking for Home,” in Jane Henrici (ed.), *Doing Without: Women and Work after Welfare Reform*, pp. 83 – 98 (Tucson, AZ: University of Arizona, 2006).

daily routine or to obtain the documents necessary to acquire photo identification as authorized by SB 14.²⁹

49. Income and financial conditions interact with relative geographic and social isolation and impede access to government-issued documents including an EIC. Minority Texans living in poverty who are managing to get by without photo identification are significantly burdened by the requirement to obtain one in order to vote in person.

Health Burdens

50. Meanwhile, health issues interact with race and ethnicity, poverty, transportation, and housing in Texas to create additional mobility impediments to the ability to obtain and renew photo identification. Compared with non-Hispanic white adults in Texas, minority individuals, particularly those who are low-income, experience higher levels of health impairment.³⁰

51. Poorer minority Texans also disproportionately struggle with managing personal or family member disabilities.³¹ At the same time, obtaining

²⁹ Holly Bell. "Putting Mothers to Work: Caseworkers' Perceptions of Low-Income Women's Roles in the Context of Welfare Reform," in Jane Henrici (ed.), *Doing Without: Women and Work after Welfare Reform*, pp. 155 – 171 (Tucson, AZ: University of Arizona, 2006); Jane Henrici, Allison Suppan Helmuth and Angela Carlberg. "Doubly Displaced: Women, Public Housing, and Spatial Analysis after Katrina," in Emmanuel David and Elaine Enarson (eds.), *The Women of Katrina: How Gender, Race, and Class Matter in an American Disaster*, pp. 142 – 154 (Nashville, TN: Vanderbilt University, 2012).

³⁰ Ronald Angel, Laura Lein, and Jane Henrici. *Poor Families in America's Health Care Crisis: How the Other Half Pays*, pp. 79 – 100 (New York: Cambridge University Press, 2006).

³¹ Deanna Schexnayder et al. *Texas Families in Transition/Surviving without TANF: An Analysis of Families Diverted from or Leaving TANF*, p. 58 (Austin, TX: Ray

federal disability status, which can result in a person being eligible for a higher level of cash assistance than most other social benefits, is an onerous process that typically requires professional legal assistance;³² indeed, research finds that a larger portion of poorer Texans have disabilities than the numbers documented by government agencies.³³ Research also shows a cyclic problem: a disability can restrict low-income minority Texans from taking the steps necessary to obtain and hold onto documents crucial for other benefits that could assist these individuals, such as housing vouchers or child care subsidies;³⁴ analogously, getting the paperwork and going through the process needed for an EIC would present similar difficulties.

Marshall Center for the Study of Human Resources, the University of Texas at Austin and the Center for Innovative Projects for Economic Development, Prairie View A&M University, 2002); Debra Skinner, William Lachicotte, and Linda Burton. "The Difference Disability Makes: Managing Childhood Disability, Poverty, and Work," in Jane Henrici (ed.), *Doing Without: Women and Work after Welfare Reform*, pp. 113 – 130 (Tucson, AZ: University of Arizona, 2006).

³² Ronald Angel, Laura Lein, and Jane Henrici. *Poor Families in America's Health Care Crisis: How the Other Half Pays*, p. 144 (New York: Cambridge University Press, 2006).

³³ Deanna Schexnayder et al. *Texas Families in Transition/Surviving without TANF: An Analysis of Families Diverted from or Leaving TANF*, p. 58 - 60 (Austin, TX: Ray Marshall Center for the Study of Human Resources, the University of Texas at Austin and the Center for Innovative Projects for Economic Development, Prairie View A&M University, 2002).

³⁴ Ronald Angel, Laura Lein, and Jane Henrici. *Poor Families in America's Health Care Crisis: How the Other Half Pays*, pp. 164 – 165 (New York: Cambridge University Press, 2006); Jane Henrici, Allison Suppan Helmuth and Angela Carlberg. "Doubly Displaced: Women, Public Housing, and Spatial Analysis after Katrina," in Emmanuel David and Elaine Enarson (eds.), *The Women of Katrina: How Gender, Race, and Class Matter in an American Disaster*, pp. 142 – 154 (Nashville, TN: Vanderbilt University, 2012).

52. Older age can also affect mobility and relative isolation.

Transportation barriers and residential distances—to hospitals and clinics for care and government agencies to obtain health care coverage—worsen health among low-income minority Texans, and existing health, disability, and possible age-related problems further limit their abilities to get to and from sites for photo and other types of documentation.³⁵

Stigma Burdens

53. In the United States, in some public discourse, poverty and seeking

assistance to mitigate it have become associated in particular with individuals who are black and Hispanic. Stigmas regarding presumed usage of social benefits and other government programs, and the awareness among low-income people of color of such stigmas and prejudices, further discourage low-income minority individuals in Texas from seeking out—or getting even when eligible—new documentation or replacing that which has been lost, destroyed (by fire or flood for example), or stolen.³⁶ Such stigmas and prejudices combine with the issues discussed above to add obstacles at every phase of getting, renewing, and using documents for those who are low-income Texans.³⁷ Intentional or not, negative attitudes and resulting

³⁵ Ronald Angel, Laura Lein, and Jane Henrici. *Poor Families in America's Health Care Crisis: How the Other Half Pays*, p. 97 (New York: Cambridge University Press, 2006).

³⁶ Jane Henrici, Allison Suppan Helmuth and Angela Carlberg. “Doubly Displaced: Women, Public Housing, and Spatial Analysis after Katrina,” in Emmanuel David and Elaine Enarson (eds.), *The Women of Katrina: How Gender, Race, and Class Matter in an American Disaster*, pp. 142 – 154 (Nashville, TN: Vanderbilt University, 2012).

³⁷ Ronald Angel, Laura Lein, and Jane Henrici. *Poor Families in America's Health Care Crisis: How the Other Half Pays*, pp. 25 – 26, 149 – 153 (New York: Cambridge University Press, 2006); Holly Bell. “Putting Mothers to Work: Caseworkers’

behaviors toward individuals because of their race and ethnic group identity form yet another obstacle for low-income minority Texans to obtaining, and keeping current, identification and other documents, whether housing vouchers, birth certificates, medical cards, school records, or an EIC.

54. Intentional interference or merely distraction can discourage poorer minority Texans from completing the steps to obtaining documents.³⁸ Such hindrances can arise with the staff or volunteers tasked with determining eligibility, processing the paperwork to gain records and documentations, or putting into use various certificates and records. Despite the many service providers across Texas who do not respond to stigmas or show racial prejudices,³⁹ and the policymakers and providers who find ways to ease rather than impede access to documentation

Perceptions of Low-Income Women's Roles in the Context of Welfare Reform," in Jane Henrici (ed.), *Doing Without: Women and Work after Welfare Reform*, pp. 155 – 171 (Tucson, AZ: University of Arizona, 2006); Alexandra Filindra. "Immigrant Social Policy in the American States: Race Politics and State TANF and Medicaid Eligibility Rules for Legal Permanent Residents," *State Politics and Policy Quarterly* 13(1): 26 – 48 (2012); Lynn M. Hempel, Julie A. Dowling, Jason D. Boardman and Christopher G. Ellison. "Racial Threat and White Opposition to Bilingual Education in Texas," *Hispanic Journal of Behavior Sciences* 35(1): 85 – 102 (2012).

³⁸ Ronald Angel, Laura Lein, and Jane Henrici. *Poor Families in America's Health Care Crisis: How the Other Half Pays*, pp. 25 – 26, 149 – 153 (New York: Cambridge University Press, 2006); Jane Henrici. "Agents of Change: Nonprofit Organization Workers following Welfare Reform," In *Doing Without: Women and Work after Welfare Reform*, pp. 172 – 189 (Tucson, AZ: University of Arizona, 2006); Jane Henrici, Allison Suppan Helmuth and Angela Carlberg. "Doubly Displaced: Women, Public Housing, and Spatial Analysis after Katrina," in Emmanuel David and Elaine Enarson (eds.), *The Women of Katrina: How Gender, Race, and Class Matter in an American Disaster*, pp. 142 – 154 (Nashville, TN: Vanderbilt University, 2012).

³⁹ Holly Bell. "Case Management with Displaced Survivors of Hurricane Katrina: A Case Study of One Host Community," *Journal of Social Service Research* 34 (3): 15 – 27 (2008).

and thus to opportunities, rights, services, and benefits,⁴⁰ problems continue.

Studies going back to at least 1983 confirm that, when tasked with implementing

anti-fraud restrictions, service providers respond by seeking to avoid “errors of

liberality;”⁴¹ in Texas, poll workers and those issuing EICs might be expected to feel

these same pressures.⁴²

⁴⁰ A new documentation requirement, for citizenship, was added on to Medicaid and Children’s Health Insurance (CHIP) programs in 2006; the documentation requirement created so many difficulties for families and administrators that it was found to cause enrollment in health coverage to go down (Benjamin D. Sommers. “Targeting in Medicaid: The Costs and Enrollment Effects of Medicaid’s Citizenship Documentation Requirement,” *Journal of Public Economics*, 94: 174 – 182; U.S. Government Accountability Office [GAO]. *Medicaid: States Reported That Citizenship Documentation Requirement Resulted in Enrollment Declines for Eligible Citizens and Posed Administrative Burdens*. Report to Congressional Requesters, 07-889 [Washington, DC: GAO, 2007]). In 2009, Federal CHIP reform (CHIPRA) addressed the problem and allowed states to match data between Medicaid-CHIP and other public benefits programs (Donna Cohen Ross. *New Citizenship Documentation Option for Medicaid and CHIP Is Up and Running: Data Matches with Social Security Administration Are Easing Burdens on Families and States* [Washington, DC: Center on Budget and Policy Priorities, 2010]). However, Texas opts not to participate in this data matching that reportedly expedites documentation (“Texas Medicaid and CHIP Programs,” Georgetown University Health Policy Institute Center for Children and Families,” <http://ccf.georgetown.edu/programs/tx-mcp/>) and thus presumably continues to have a documentation requirement that impedes enrollment.

⁴¹ Evelyn Brodtkin and Michael Lipsky. “Quality Control in AFDC as an Administrative Strategy,” *Social Service Review*. 57 (1): 1 – 34 (1983).

⁴² Michael Alvarez and Thad E. Hall. “Controlling Democracy: The Principal-Agent Problems in Election Administration,” *Policy Studies Journal*. 34 (4): 491 – 510 (2006); Lonna Rae Atkeson, Lisa Ann Bryant, Thad E. Hall, Kyle L. Saunders, R. Michael Alvarez. “A New Barrier to Participation: Heterogeneous Application of Voter Identification Policies,” *Electoral Studies*. 29: 66 – 73 (2010); Thad E. Hall, J. Quin Monson, and Kelly D. Patterson. The Human Dimension of Elections: How Poll Workers Shape Public Confidence in Elections. *Political Research Quarterly*. 62 (3): 507 – 522 (2009); Jason H.T. Karlawish et al. “Identifying the Barriers and Challenges to Voting by Residents in Nursing Homes and Assisted Living Settings,” *Journal of Aging & Social Policy*, 20 (1): 65 – 79 (2008); Antony Page and Michael J. Pitts. “Poll Workers, Election Administration, and the Problem of Implicit Bias,” *Michigan Journal of Race & Law*, 15 (1): 1 – 56 (2009); Gillian E. Piner and Michael D.

55. Relevant racial and ethnic stigmas and prejudices persist, despite the fact that Texas is now a “minority-majority” state.⁴³ That is, as U.S. Census data from 2012 (Figure 2) shows, the percentage of non-white populations in Texas (55.5 percent) is now greater than that of non-Hispanic white Texans (44.5 percent).

Byrne. “The Experience of Accessible Voting: Results of a Survey among Legally-Blind Users [in Houston].” In *Proceedings of the Human Factors and Ergonomics Society 55th Annual Meeting*, 1686 – 1690 (2011)
<http://chil.rice.edu/research/pdf/PinerByrneHFES11.pdf>.

⁴³ Ronald Angel, Laura Lein, and Jane Henrici. *Poor Families in America’s Health Care Crisis: How the Other Half Pays*, pp. 25 – 26, 149 – 153 (New York: Cambridge University Press, 2006); Jane Henrici. “Agents of Change: Nonprofit Organization Workers following Welfare Reform,” In *Doing Without: Women and Work after Welfare Reform*, pp. 172 – 189 (Tucson, AZ: University of Arizona, 2006).

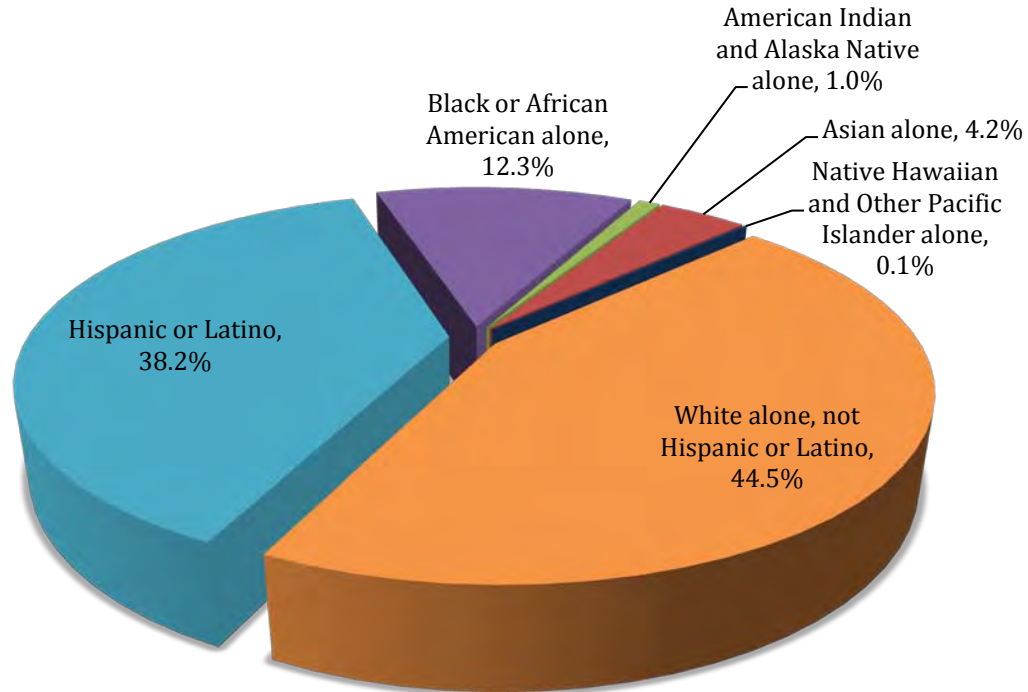


Figure 2: Texas Population by Race or Ethnic Group, 2012

Source: U.S. Census Bureau: State and County QuickFacts. Data derived from Population Estimates, 2012 American Community Survey, 1-Year Estimates

56. Low-income minorities struggle more than their fellow Texans with the need to care for their families, stay employed, afford transportation, and deal with health problems all while confronting stigmas about poverty and racial identity. These same factors inhibit their ability to renew any photo documentation they might have let expire or obtain new documentation⁴⁴—even one that does not

⁴⁴ Ronald Angel, Laura Lein, and Jane Henrici. *Poor Families in America's Health Care Crisis: How the Other Half Pays*, pp. 161 – 167 (New York: Cambridge University Press, 2006).

have a direct fee associated with its issuance such as the EIC—if they want to vote in person.

V. Conclusion

57. SB 14 demands that Texans who do not have an updated form of specified photo identification and who wish to vote in person must obtain one in order to vote. SB 14 requires these Texans—but not other registered voters—to spend additional time and resources that poorer minority Texans are unable to afford to submit paperwork to prove eligibility and obtain such documentation. Unless a document is intended to help a child, or might serve to directly increase income, reduce debt, or save on spending, low-income black and Hispanics in Texas encounter more disadvantages and discouragements than advantages or assistance with obtaining the paperwork needed for photo identification and obtaining that photo identification itself.

58. At the same time, not having documentation can lead to other obstacles for individuals and households.⁴⁵ Minority Texans who do not have appropriate records on hand—to prove eligibility for a subsidy, school credit, parole status, child custody, or work hours completed, for example—face stigmas and difficulties that interact and multiply. As another researcher has described it, it can

⁴⁵ Amanda Tillotson and Laura Lein. *Lack of Identification and Associated Difficulties: Results from Study of Austin Panhandlers* (unpublished report, authors' communication, 2014)

“take ID to get ID”⁴⁶ and this, along with the configuration of obstacles that low-income Texan minorities face, can seem insurmountable. Taken together, multiple impediments disproportionately affect low-income Texans of racial and ethnic minorities in their efforts to obtain, renew, and maintain photo identification in order to vote.

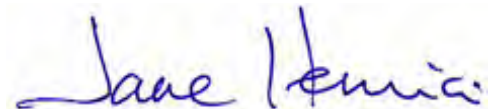
59. Poorer minorities in Texas face some combination of the following in order to obtain photo identification and preserve their right to vote: 1) potential loss of wages, on an already unreliable low income, from unpaid time off work; 2) difficulties with transportation and relative social and economic isolation; 3) health, age-related impediments and possibly disability problems; and 4) requirement to safely transport original documents or new ones and prevent their loss through theft, accident, or mistakes on the part of others, including service providers and eligibility caseworkers. Many poor Texan voters, disproportionately minority, will postpone or forego the challenge of obtaining the necessary photo identification since it is of little immediate benefit to their lives or those of their family members. The law demands that Texan voters present photo identification to vote in person. Low-income minority voters, who already experience difficulties with documentation in general and who are less likely to already have the photo documentation required by SB 14 in particular, will face significant obstacles to procure the documentation required by SB 14.

⁴⁶ Amy Blank Wilson. “It Takes ID to Get ID: The New Identity Politics in Services,” *Social Service Review* 83 (1): 111 – 132 (2009)

60. Based on this review of the literature, policies, and data, I conclude that poorer Texans of racial and ethnic minorities who do not already possess an acceptable and current form of photo identification disproportionately face burdens under SB 14 in obtaining one.

I declare under penalty of perjury that the aforementioned is true and correct to the best of my knowledge.

Executed this 27th day of June 2014.

A handwritten signature in blue ink, appearing to read "Jane Henric". The signature is written in a cursive, flowing style.

VI. Appendix: Curriculum Vitae

JANEM. HENRICI, PH.D.
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EDUCATION

Ph.D. University of Texas at Austin, Anthropology, 1996
M.A. University of Chicago, 1981
B.A. University of Texas at Austin, *Cum Laude*, 1979
Southern Methodist University, 1976–77

CORE COMPETENCIES

Twenty years research experience including eight years managing large-scale projects, with excellent data analysis and report writing skills

Field experience at national, community, and organizational levels within developing nations and across the United States

Accomplished public speaker for U.S. and international panel discussions on poverty, race and ethnicity, gender, health, trade, development, and disaster

Fluent in Spanish, at professional level

SELECT PROFESSIONAL EXPERIENCE

Research

Independent Consultant, Present. Senior researcher and advisor on mainstreaming gender, and race and ethnicity; specialties in issues of livelihood development, displacement, disasters, poverty, and policy

Study Director, Institute for Women's Policy Research, 2008-2013. Supervised and conducted research and analysis independently and in group projects on gender, development, disparity, and policy; authored and co-authored reports and publications including policy recommendations; prepared grants, legislative, media and other communication; served on review committees and worked with outside researchers, policymakers, academics, and advocates; specialization in qualitative and mixed methods; responsibilities included:

- Conducted qualitative field research and co-authored published report for a mixed methods study about NGOs and faith-based organizations working to assist Latin American immigrant women in three U.S. urban areas; funded by the Ford Foundation; conducted interviews in English and in Spanish
- Supervised and conducted desk-based research, and authored and co-authored published reports and materials for immigration and labor policy advocates, regarding career development and visa issues among immigrant women in-

home care workers in the United States; funded by Ms. Foundation, Open Society Foundations, and the Annie E. Casey Foundation

- Supervised and conducted multi-year field research with African American women tenants of New Orleans public housing and Hurricane Katrina; co-authored fact sheets, a book chapter; authored funder's report; analyzed data within context of U.S. disaster, urban planning, and social safety net policies and authored report for publication currently under review; funded by the Bill & Melinda Gates Foundation as a Social Science Research Council (SSRC) Katrina Task Force project
- Directed team that coded all focus group data across 19 nations for the World Bank's "*World Development Report 2012: Gender Equality and Development*;" subcontracted by World Bank
- Directed IWPR team in partnership with International Foundation for Electoral Systems (IFES) team in original field survey design and analysis, report publication, and in-country presentations on the status of women in the Middle East and North Africa; co-authored capacity-building toolkit for NGOs to improve policy using status of women research; funded by Canadian International Development Agency
- Conducted expert interviews for analysis of and recommendations concerning best practices in postsecondary education programs helping low-income student parents in United States; funded by Bill & Melinda Gates Foundation
- Managed portion of focus group study examining barriers to women running for high-level elected offices; funded by Hunt Alternatives Fund

Principal Investigator, George Washington University Grants, Global Gender Program, Elliott School of International Affairs and International Institute of Tourism Studies, June 2013. Conducted open-ended interviews with government and NGO representatives, and with low-income women across multiple communities, on post-disaster development following the 2007 earthquake along Peru's southern coast as part of a proposed larger study

Principal Investigator, Faculty Research Grants, Office of Vice-Provost for Extended Programs, University of Memphis, 2006–2007. Evaluated nonprofit job training and housing programs to assist low-income African American and immigrant Latina women; conducted preliminary study of communities to be impacted by NAFTA highway expansion in Tennessee; conducted interviews in English and in Spanish

Visiting Fulbright Scholar, J. William Fulbright Foreign Scholarship Board Award, 2006. Interviewed Peruvian NGOs assisting women through development tourism and handicraft export, investigated potential effects of Peru-US Trade Agreement on small-scale producers; conducted interviews in Spanish

Research Scientist, Pennsylvania State University, John D. and Catherine T. MacArthur Foundation, University of Texas at Austin Center for Social Work Research, Robert Wood Johnson Foundation sub-contracts, 2002 and 2003.

Analyzed longitudinal qualitative material and published with analyses of multi-wave quantitative data, from Boston, Chicago, and San Antonio for “Welfare, Children, & Families: A Three-City Study,” on conditions related to changes in U.S. social safety net policies affecting low-income women and their households; supervised San Antonio follow-up interviews and qualitative data management

Research Scientist and Postdoctoral Research Fellow, “Welfare, Children, and Families: A Three-City Study,” University of Texas at Austin Population Research Center, Center for Social Work Research, 1998–2001. Managed San Antonio site for interdisciplinary and longitudinal research project; conducted qualitative ethnographic research with low-income women, less than half of whom were receiving TANF (cash welfare) and the other portion were income-eligible although not enrolled, and with local private nonprofit organizations and government agencies; trained and supervised teams of graduate and undergraduate students in interview methods, ethnographic theory, and QSR NVivo coding and analysis; following fellowship (1998-2000), hired as research scientist (2000-2001); conducted interviews in English and in Spanish

Contract Field Researcher, University of Texas at Austin Center for the Study of Human Resources and Lyndon B. Johnson School of Public Affairs, 1996–1997. Interviewed low-income adults on Food Stamp use for published report; conducted interviews in English and in Spanish

Contract Ethnographer, “Minority Math and Science Education Cooperative,” Texas Higher Education Authority, 1991–1992. As part of a statewide study, residing for three-month periods within homes in two working-class neighborhoods in a U.S.-Mexico border city; conducted ethnographic project inside classrooms and homes interviewing citizen and non-citizen elementary school students, their parents, and their teachers; conducted interviews in English and in Spanish

Consulting

Technical Consultant, Solimar International advisor, June 2014. Advised on social justice/gender mainstreaming project innovation and design within sustainable business development in the nation of Jordan

Technical Consultant, Health Policy Project (Futures Group)/U.S. Agency for International Development and the President’s Emergency Plan for AIDS Relief, May 2014. Advised on gender-responsive health governance, policy, and implementation

Technical and Research Consultant, American Planning Association/Centers for Disease Control and Prevention, 2012-2013. Advised on gender and other aspects of inclusion and diversity within city planning, and on study design and qualitative research methods; served as reviewer on report, *Integrating Health Into the Comprehensive Planning Process: An analysis of seven case studies and recommendations for change*, by Anna Ricklin and Nick Kushner

Training

Lawry Research Associates International, 2013. Conducted training workshop on qualitative data coding and analysis

Mathematica Policy Research, Inc., 2000. Prepared quantitatively trained professional researchers in ethnographic research methods

Teaching and Advising

Professorial Lecturer, George Washington University Elliott School of International Affairs and Global Gender Graduate Program, 2012–present

Graduate Committee Faculty, University of California-Los Angeles Department of Political Science, 2011-2014

Lecturer and Graduate Committee Faculty, George Mason University Department of Anthropology, 2008

Assistant Professor, University of Memphis Department of Anthropology and Honors Program, 2001–2008

Visiting Fulbright Scholar, Catholic University of Peru Department of Anthropology and Graduate Program in Gender Studies, 2006

SELECT PUBLICATIONS

Peer-reviewed Books

2006 Editor, *Doing Without: Women and Work after Welfare Reform*, Tucson: University of Arizona

2006 (with Ronald Angel and Laura Lein) *Poor Families in America's Health Care Crisis: How the Other Half Pays*, New York: Cambridge University; *Choice* 2007 Outstanding Academic Title

Peer-reviewed Book Chapters and Articles

2014 Disasters, Gender, and Policy, in *International Encyclopedia of the Social and Behavioral Sciences*, 2nd edition, edited by James Wright, Elsevier, submitted and under review

2014 Seeking Equilibrium: Gender, Ethnicity, and Race within Alternative Trade and Tourism Development, in *Towards a Publicly Relevant Anthropology*, edited by Elisabeth Tauber and Dorothy Zinn, Bozen Bolzano University, under revision and forthcoming

2012 (with Allison Suppan Helmuth and Angela Carlberg) Doubly Displaced: Women, Public Housing, and Spatial Analysis after Katrina, in *The Women of Katrina: How Gender, Race, and Class Matter in an American Disaster*, edited by Emmanuel David and Elaine Enarson, Vanderbilt University, pp. 142-154

2010 Free Trade, Alternative Trade, and Women in Peru: A First Look. In *Gender and Globalization: Patterns of Women's Resistance*, edited by Erica G. Polakoff and Ligaya Lindio-McGovern, Whitby, Ontario: de Sitter Publications; reprint of 2007 Free Trade, Alternative Trade, and Women in Peru: A First Look, *Journal of Developing Societies*; 23: 145–157

2010 Naming Rights: Ethnographies of Fair Trade, In *Fair Trade and Social Justice: Global Ethnographies*, edited by Sarah Lyon and Mark Moberg. New York: New York University, pp. 283-298

2007 Género, Turismo y Exportación: ¿Llamando a la plata en el Perú? *Antropológica*. XXV (25): 83-101

2007 (with Laura Lein and Ronald Angel) Women and Children and the Health Care Gap, In *Child Poverty in America Today, Vol. 4: Children and the State*, edited by Barbara A. Arrighi and David J. Maume, Westport, CT: Praeger, pp. 56–70

2006 Agents of Change: Nonprofit Organization Workers following Welfare Reform, In *Doing Without: Women and Work after Welfare Reform*, Tucson: University of Arizona, pp. 172–189

2006 (with E. Carol Miller) Work First, Then What? Families and Job Training after Welfare Reform, In *Doing Without: Women and Work after Welfare Reform*, Tucson: University of Arizona, pp. 64–80

2006 (with Laura Lein and Ronald Angel) Women after Welfare Reform. In *Doing Without: Women and Work after Welfare Reform*, Tucson: University of Arizona, pp. 1–19

Policy Briefs, Fact Sheets, and Reports

2013 “Improving Career Opportunities for Immigrant Women In-Home Care Workers,” IWPR #I925

2013 (with Cynthia Hess) “Increasing Pathways to Legal Status for Immigrant In-Home Care Workers,” IWPR #I924

2012 “Community College Partnerships for Student and Career Success: Program Profile of *Carreras en Salud*,” IWPR #C397

2012 (with Jennifer Herard, Kevin Miller, and Barbara Gault) “Low Literacy Means Lower Earnings, Especially for Women,” IWPR #C392

2010-2011 (with multiple authors) Topic briefs on the Status of Women in the Middle East and North Africa on Morocco, Yemen, and Lebanon, IWPR and International Foundation for Electoral Processes

2011 (with Cynthia Hess and Claudia Williams) "Organizations Working with Latina Immigrants: Resources and Strategies for Change," IWPR, #1922

2010 (with Allison S. Helmuth, Frances Zlotnick, and Jeff Hayes) "Women in Poverty During the Great Recession: Public Benefits Do Not Always Respond to Rising Need, Variation Across States is Substantial," IWPR, #D493

2010 (with Allison S. Helmuth) "Women in New Orleans: Race, Poverty, and Hurricane Katrina," IWPR, #D490

2010 (with Allison S. Helmuth and Rhea Fernandes) "Mounting Losses: Women and Public Housing after Hurricane Katrina," IWPR, #D491

2010 (with Allison S. Helmuth and Jackie Braun) "Women, Disasters, and Hurricane Katrina," IWPR, #D492

2001 (with Ronald Angel, Laura Lein, and Emily Leventhal) Health Insurance Coverage for Children and Their Caregivers in Low-income Urban Neighborhoods, for Welfare, Children and Families: A Three-City Study Policy Brief 01-2, Johns Hopkins University

2001 (with Andrew Cherlin, Linda Burton, Judith Francis, Laura Lein, James Quane, and Karen Bogen) Sanctions and Case Closings for Noncompliance: Who Is Affected and Why, for Welfare, Children and Families: A Three-City Study Policy Brief 01-1, Johns Hopkins University

2001 (with Andrew Cherlin, Paula Fomby, Ronald Angel) Public Assistance Receipt among Native-Born Children of Immigrants, for Welfare, Children and Families: A Three-City Study Policy Brief 01-3, Johns Hopkins University

Book Reviews

2014 (with Allison Suppan Helmuth) *Driven from New Orleans: How Nonprofits Betray Public Housing and Promote Privatization*, by John Arena, University of Minnesota Press, 2012. *Sociological Inquiry*, in press

2012 *Unveiling Secrets of War in the Peruvian Andes*. Olga M. González. Chicago: University of Chicago Press, 2011. *Visual Anthropology Review*, 28(1): 78-79

2011 *Capitalizing on Catastrophe: Neoliberal Strategies in Disaster Reconstruction*, edited by Nandini Gunewardena and Mark Schuller, *American Ethnologist* 38(4): 848-849

2000 *Cultural Tourism: A Strategic Focus*, by Alf H. Walle, *Practicing Anthropology*, 22(3): 4

Toolkit

2012 (with Denise Baer, Layla Moughari, and Barbara Gault) *Using Research on the Status of Women to Improve Public Policies in the Middle East and North Africa: A Capacity-Building Toolkit for Nongovernmental Organizations*. Washington, DC: IFES and IWPR

Other

2010 A Gendered Response to Disaster: In the Aftermath of Haiti's Earthquake. *Anthropology News* 51(7): 5

2006 (with Polly Spiegel). The Non-Public Process of a US Interstate Highway Corridor, Society for the Anthropology of North America column, *Anthropology News*, March

2004 Training them to Take It: Research on Job Training for Low-Income Women in the US, *Standpoint*, Center for Research on Women, University of Memphis, March

2002 US Women and Poverty, *Voices –Association for Feminist Anthropology Special Issue*, edited by Sandra Morgen, pp. 27–31

SELECT HONORS AND AWARDS

2011	Listed as Woodrow Wilson International Center for Scholars Expert, Gender
2007	<i>Poor Families in America's Health Care Crisis</i> named one of the <i>Choice</i> Outstanding Academic Titles for 2007
2007	Honorable Mention, 2006 Susan Koppelman Best Anthology, Multi-Authored or Edited Book in Feminist Studies in Popular/American Culture, Popular/American Culture Association, for <i>Doing Without: Women and Work after Welfare Reform</i>
2006	Visiting Scholar Award, J. William Fulbright Foreign Scholarship Board, for project "Gender and Free Trade: Peruvian Alternative Trading Projects and Free Trade Agreements," Peru
2005–2006	Distinguished Faculty Teaching Award Finalist, University of Memphis
2006–	Phi Beta Delta Honor Society for International Scholars
2003–2009	Research Affiliate Status, Center for Research on Women, University of Memphis
1989–	Phi Kappa Phi Academic Honor Society (Life Membership)

SELECT GRANTS AND CONTRACTS

Institutional External Funding

2010–2013	Project Director, proposal co-author, multiple grants and contracts to IWPR
2006–2007	Co-Principal Investigator, written into Community Foundation of Greater Memphis Community Grant, to Memphis Area Women's Council Workforce Action Collaborative

- 2005 Faculty Exchange Award, Regional Educational Network Between the European Union and the United States (RENEUUS), for "Gender, Tourism and Free Trade"
- 2005 Faculty Exchange Award, University Center for International Studies, Center for the Study of the American South, and The Rockefeller Foundation, "Navigating the Globalization of the American South" Conference, University of North Carolina-Chapel Hill
- 2003 Research Scientist, "Welfare, Children and Families: A Three-City Study," sub-contracted with the University of Texas Center for Social Work Research under grant from The Robert Wood Johnson Foundation
- 2002 Research Scientist, "Welfare, Children and Families: A Three-City Study," sub-contracted with Pennsylvania State University under grant from The John D. and Catherine T. MacArthur Foundation
- 2000-2001 Research Scientist, "Welfare, Children and Families: A Three-City Study," sub-contracted with the University of Texas Center for Social Work Research under grant from The Robert Wood Johnson Foundation
- 1998-2000 Postdoctoral Research Fellowship, Hogg Foundation Award, The University of Texas at Austin Population Research Center/Center for Social Work Research

Institutional Internal Funding

- 2013 Principal Investigator, "Gender, Race, and Tourism Development in Disaster Recovery," Research Grants from Global Gender Program, Elliott School of International Affairs, and International Institute of Tourism Studies, School of Business, of The George Washington University
- 2006 Principal Investigator, Faculty Research Grant, The Office of Vice-Provost for Extended Programs, University of Memphis, for "Women and Memphis Workforce Development"
- 2005-2006 Principal Investigator, Benjamin L. Hooks Institute for Social Change Working Group Grant, with Steve Scanlan, for "North American Research and Action Network: 2005 Web Focus," public access and education
- 2005 Faculty Exchange Award, Center for Research on Women, University of Memphis, "Imagining Public Policy to Meet Women's Economic Security Needs" Conference, CCPA/Simon Fraser University, Vancouver, British Columbia, Canada
- 2005 Faculty Exchange Award, Center for Research on Women, University of Memphis, "Women and Globalization" Conference, San Miguel de Allende, Mexico

SELECT CONFERENCE AND SYMPOSIA PRESENTATIONS

"Gender and Migration in U.S. Planning: Recognizing Problems and Improving Responses," on Hosted Organized Session "Overcoming Gender Bias in Immigrant

Communities,” American Planning Association 2014 National Planning Conference, Atlanta, 27 April 2014

“Gender and Race Post-Disaster in Peru: Resilience, Recovery, and Research,” Institute for Global and International Studies Sandwich Symposium, Elliott School of International Affairs, George Washington University, 24 October 2013

“Post-Disaster Organizing to Help Women Across the Americas: Resilience, Recovery and Research,” 63rd Society for the Study of Social Problems Annual Meeting, New York, 11 August 2013

“Research on Women in the Middle East and North Africa & The Arab Spring: Findings from Gender Surveys in Lebanon, Morocco, and Yemen and Electoral Surveys in Egypt and Tunisia,” with Rola Abdul-Latif, Middle East Dialogue, International Policy Studies Organization, Washington, DC, 24 February 2012

“Gender and Disaster across the Americas,” 4th Annual Lozano Long Conference, “From Natural Events to Social Disasters in the Circum-Caribbean,” Lozano Long Institute for Latin American Studies, University of Texas at Austin, Austin, 25 February 2011

“Intersectional Policy: Gender, Race and Ethnicity Meet Immigrant Status,” on Organized Session “The Racialization of Latinos: Everyday Lived Experiences Of Discrimination,” Patricia Foxen, Organizer, 110th Annual meeting of American Anthropological Association, Montreal, 16-20 November 2011

“After the Flooding of New Orleans: Women, Public Housing, Transportation, and Disasters,” on Invited Organized Session, American Educational Research Association Annual Meeting, New Orleans, 8-12 April 2011

“Organizations Working with Latina Immigrants: Resources and Strategies for Change,” report release co-speaker, Institute for Women’s Policy Research-National Council of La Raza-Wilson Center Joint Symposium, at Woodrow Wilson International Center for Scholars, Washington, DC, 25 March 2011

“‘You’ve Got to Tell Them’: Research with Women Displaced from New Orleans Public Housing,” on Organized Session with Executive, Engaging Anthropology, and Association for Feminist Anthropology Invited Status, “Doubly Displaced: Women and Public Housing after the New Orleans Post-Katrina Flood,” 109th Annual Meeting of the American Anthropological Association, New Orleans, 17-21 November 2010

“Gender and Disaster in the Americas,” on Organized Session Invited by Society for Latin American and Caribbean Anthropology, “Conversations across the Americas,” Ramona Perez, Organizer/Chair, 109th Annual Meeting of American Anthropological Association, New Orleans, 17-21 November 2010

"New Families, New Friends: Gaps in Support Services for Latina Immigrants," Latin American Studies Association International Congress, Toronto, 6-9 October 2010

"Space in the City: Women, Public Housing, and Urban Planning after Katrina," at symposium "Hurricane Katrina: Bringing Hurricane Katrina Research Back to the Community," Center for Policy and Resilience Conference, University of Southern Mississippi Gulf Coast, Long Beach, 4-5 June 2010

"Revolving Funds: Peruvian Women Migrants as Workers, Entrepreneurs, and Tourists," on Organized Session, "From Remitting Migrants to Market-Savvy Entrepreneurs: Reconceptualizing Diaspora and Development," Caroline Melly and Monica DeHart, Co-Organizers/Chairs, 107th Annual Meeting of American Anthropological Association, San Francisco, 19-23 November 2008

"Peruvian Women, Free Trade Agreements, and Alternative Trade: A New Look" with Organized Session Co-Invited by Society for Urban, National and Transnational/Global Anthropology and Association for Political and Legal Anthropology, "NGOs as Agents of Globalization," Mark A. Schuller, Organizer/Chair, 105th Annual Meeting of American Anthropological Association, San Jose, California, 15-19 November 2006

"El Género, la Exportación, y el Turismo: Nuevos Cambios" Fulbright Commission and Catholic University of Peru Department of Social Sciences, Lima, Peru, 6 July 2006

"Gender and Free Trade: Alternative Trade Organizations and Women in Peru" on Organized Session, "Fair Trade/Free Trade: Alternatives and Realities in Cross-Cultural Perspective," Sarah M. Lyon, Organizer/Chair, 104th Annual Meeting of American Anthropological Association, Washington, DC, 30 November-4 December 2005

"Learning to be Poor: Job Training and Women in the US," "Imagining Public Policy to Meet Women's Economic Security Needs" Conference, CCPA/Simon Fraser University, Vancouver, 14-15 October 2005

"Exchanges South and North: Collaboration and Communication and the NGO/Nonprofit Sector," on Organized Session "NGO Research: Methodological and Ethical Challenges," Nathalie Lebon, LeeRay Costa, and Donna Murdock, Co-Organizers/Chairs, 101st Annual Meeting of the American Anthropological Association, New Orleans, 20-24 November 2002

"Neighborhood Organizations and the People Who Use Them: A Spatial Consideration of Welfare Reform," with James Quane, Pamela Joshi, and Gwendolyn Dordick, on Invited Session, "Not by Jobs Alone: Families, Neighborhoods, and Welfare Reform," Linda M. Burton and William Julius Wilson, Co-Organizers, Annual

Meeting of American Sociological Association, Chicago, 16-19 August 2002

"Health Insurance Coverage for Vulnerable Children in the Context of Welfare Reform," co-presenter with Ronald Angel and Laura Lein, with organized poster symposium, "The Three-City Study of Welfare, Children, and Families: A Multidisciplinary Approach for Science to Influence Policy," Lindsay Chase-Landsdale, Organizer, Biennial Meeting of Society for Research in Child Development, Minneapolis, 19-22 April 2001

"Women, Wages, and Motherhood within Welfare Reform," co-author Laura Lein, with Organized Session, American Anthropological Association 100th Annual Meeting, Washington, DC, 28 November–2 December 2001

"Women's Studies and Research on Poverty," Women's Studies Symposium, "Women's Studies Scholarship at the University of Memphis," University of Memphis, 5 October 2001

"Health Insurance Coverage for Vulnerable Children in the Context of Welfare Reform," co-presenter with Ronald Angel and Laura Lein, with organized poster symposium, "The Three-City Study of Welfare, Children, and Families: A Multidisciplinary Approach for Science to Influence Policy," Lindsay Chase-Landsdale, Organizer, Biennial Meeting of Society for Research in Child Development, Minneapolis, 19–22 April 2001

"Being Blamed: Women and Local Responses to Welfare-To-Work," with Organized Session, "Engendered Economies: Women and Alternative Organizations in the Americas," Society for Latin American Anthropology Annual Meeting/Latin American Studies Association Semi-Annual Meeting, Miami, 16–18 March 2000, with Organized Session, "Engendered Economies: Women and Alternative Organizations in the Americas" Invited by Association for Feminist Anthropology, American Anthropological Association 98th Annual Meeting, Chicago, 17–21 November 1999

"A Three-City Ethnography," with Organized Session, "Combining Qualitative and Quantitative Data in Impact Evaluations of Welfare Reform," Twenty-first Annual Association for Public Policy Analysis and Management Research Conference, Washington, DC, 4–6 November 1999

INVITED LECTURES

"Caring for Workers and Workers Who Care: Gender and Migration Issues in U.S. Policy and Planning," Institute for Immigration Research Colloquium presentation and webcast, George Mason University, 29 January 2014

"Working Together: Low-Income Latina Immigrants, Service Organizations, and Northern Virginia," Smithsonian Cultural Center presentation and webcast, Washington, DC, 5 December 2012

“Research and Resilience,” George Washington University’s Global Gender Program and World Bank’s Global Facility for Disaster Reduction and Recovery (GRDRR) event, “Women and Girls: Forces for Creating Disaster-Resilient Societies,” Washington, DC, 11 October 2012

“Anthropology and Policy: Poverty and Reform in the United States,” and “Rethinking Fair Trade: Gender and Ethnicity within Transnational Handicraft Exchanges,” at the Free University of Bozen-Bolzano, Italy, 8 and 9 October 2012

“Dangerous Intersections: Issues of Identity and Disaster Policy,” Department of Women’s Studies, San Diego State University, CA, 19 October 2011

“Disasters and the Intersections of Race, Gender, and Class Across the Americas,” Trevor W. Purcell Lecture, Department of Anthropology, University of South Florida, FL, 13 April 2011

“Ethnicity, Gender, Trade, and Tourism: Shifting Identities and Peru,” Critical Race Studies, Benjamin L. Hooks Institute Working Group, University of Memphis, 30 October 2006

“Gendered Transnational Processes,” Symposium on “National and International Migration: Implications for the Sending and Receiving Zones,” Catholic University of Peru Graduate School of Social Sciences, Lima, Peru, 30–31 March 2006

“El Género y la globalización,” International Economics, College of Communication Faculty of Universidad Pontificia de Salamanca, Spain, 10 May 2005

Keynote Speaker, Executive Directors’ Roundtable, “Women after Welfare Reform,” United Neighborhood Centers of America, Inc., San Antonio, TX, 11 February 2000

SELECTED SERVICE

Listed Expert, Woodrow Wilson International Center for Scholars, 2011-present

President, 2011-2013; *President-Elect*, Association for Feminist Anthropology, 2009–2011; *Executive Board Member*, Association for Feminist Anthropology, 2006–2008

Council Member, Society for Latin American and Caribbean Anthropology, 2009–2012

Proposal Reviewer, Rockefeller Foundation Bellagio Scholarly Residency Competition, 2008

Advisory Committee Member and Program Evaluator, *Mi Techo* non-profit organization assisting low-income Latin American immigrants with housing issues, 2005–2007

Advisory Committee Member and Program Evaluator, La Maestra, non-profit organization providing English-as-a-Second-Language classes to low-income recent Latin American immigrants, 2003–2007

Grant Proposal Reviewer, Social Science and Humanities Research Council of Canada, Special (three-year) Research Opportunity Program for Professors, 2006

Grant Proposal Reviewer, United States Social Science Research Council and American Council of Learned Societies International Dissertation Field Research Fellowship Program 2003, 2004, 2005

PROFESSIONAL MEMBERSHIPS

American Anthropological Association
and sections:

Association for Feminist
Anthropology; Society for the
Anthropology of North America;
Society for the Anthropology of
Work; Society for Economic
Anthropology; Society for Latin
American and Caribbean
Anthropology; Society for Urban,
National, and
Transnational/Global
Anthropology; Society for Visual
Anthropology

Gender and Disaster Network
Latin American Studies Association
and sections:

Ethnicity, Race, Indigenous Peoples;
Gender and Feminist Studies
Section
Latino Studies; Peru
NGOs and Anthropology Group
Society for Applied Anthropology
Society for International
Development, Washington, DC
Washington Association of
Professional Anthropologists

EXHIBIT F

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Actions No. 2:13-cv-193 (NGR)
(Consolidated Case)

**UNITED STATES' NOTICE OF FILING OF THE
SUPPLEMENTAL EXPERT REPORT OF DR. GERALD WEBSTER**

At the Court's direction, the United States hereby files the supplemental expert report of Dr. Gerald Webster, which is attached hereto.

Date: August 15, 2014

KENNETH MAGIDSON
United States Attorney
Southern District of Texas

Respectfully submitted,

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Acting Assistant Attorney General
Civil Rights Division

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CERTIFICATE OF SERVICE

I hereby certify that on August 15, 2014, I served a true and correct copy of the foregoing via the Court's ECF system on the following counsel of record:

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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Actions No. 2:13-cv-193 (NGR)
(Consolidated Case)

DECLARATION OF DR. GERALD R. WEBSTER

Pursuant to 28 U.S.C. § 1746, I, Gerald R. Webster, make the following declaration:

INTRODUCTION

This report replaces my June 30, 2014 report. Portions of the earlier report were based on an erroneous data set pertaining to registered voters without appropriate identification to vote under SB 14. That data set was corrected and resupplied to me. Reflecting the corrected data, there are changes to paragraphs 66-72 and 74. Also corrections were made to Tables 4A, 4B, 4C, 6A, 6B, 8A, 8B, 8C, 9 and 10, as well as Figures 25-29. Finally, while updating my report I found that I had erroneously indicated that there are 139 census tracts in Texas with more than 25% of their households having no access to a motor vehicle. The correct number is 138. Corrections pertaining to this error were made in paragraphs 23 and 67.

1. I am a Professor of geography at the University of Wyoming, Laramie, Wyoming, where I also serve as departmental chair. Prior to assuming my current position at Wyoming in fall 2007, I was a faculty member in the Department of Geography at the University of Alabama for eighteen years, serving as departmental chair the last seven. My formal education includes a BA (1975) in political science from the University of Colorado-Denver, a MS (1980) in

geography from Western Washington University, and a Ph.D. (1984) in geography from the University of Kentucky.

2. My primary research and teaching emphases are in political geography. I have published over 80 articles in refereed journals, book chapters, and edited volumes. In 2011, I was given the Lifetime Achievement Award by the Southeastern Division of the Association of American Geographers, and in 2012 I was selected to provide the Political Geography Plenary Lecture at the Association of American Geographers meeting. I have provided written reports, oral testimony, or both in litigation in ten states. My CV accompanies this report (Appendix 4).

3. I have been asked by lawyers at the United States Department of Justice to determine whether implementation of Texas's photographic voter identification law (SB 14) will have differential effects on racial and language minority groups, with emphasis on the contrasts between Non-Hispanic whites (Anglos), Hispanics, and Non-Hispanic African Americans. I have been specifically asked to assess obstacles associated with obtaining an Election Identification Certificate (EIC) due to the residential patterns of different racial and ethnic groups, access to a motor vehicle, and poverty.

4. To complete this report data were examined from the 2000 and 2010 United States Censuses and the 2006-2010 and 2008-2012 American Community Survey (ACS) Five-Year Estimates. In addition, data were examined regarding the locations of Texas Department of Public Safety (DPS) offices at which potential voters can secure EICs and other forms of identification sufficient to cast a valid in-person ballot under SB 14, the location of local government offices at which potential voters can apply for EICs, and the locations of temporary mobile offices at which potential voters can apply for EICs. This report relies more heavily on the 2006-2010 ACS Five-Year Estimates because that release includes data on household access

to motor vehicles by race and language minority group that were not included in the 2008-2012 ACS Five-Year Estimates. I also examined mass transit ridership statistics for Houston, San Antonio, and Dallas. Finally, I examined the distribution of registered voters who lack appropriate identification from the “no match list” developed by Professor Stephen Ansolabehere.

5. The decennial census is intended as a complete enumeration of the U.S. population. Beginning with the 2010 Census, the number of questions asked of respondents was limited to approximately ten. The ACS is intended to collect much of the data historically provided by the census long form through annual surveys of the U.S. population. See U.S. Census Bureau, 2008, *A Compass for Understanding and Using American Community Survey Data*. It is important to note that the ACS does not replace the decennial census and in fact uses decennial census population counts as a baseline on which to calculate its rolling annual estimates of characteristics of the population.

6. Many of the calculations and all of the maps included in this report were made by the University of Alabama Cartographic Research Laboratory under my direction. I have employed the Laboratory for expert witness work since the mid-1990s and for academic research efforts since the late 1980s.

7. This report includes multiple sections. Immediately following is an “Executive Summary” stating the report’s primary general findings. The following section provides an overview of the demographic diversity and population growth rates in Texas. The third section briefly outlines the types of photographic identification that may be used in order to cast a valid in-person ballot under SB 14. The fourth section lays out the methods used to determine if it will be more difficult for African Americans and Hispanics to obtain an EIC as compared to

Anglos. The fifth section examines evidence for these differential effects in the State's three largest cities: Houston, San Antonio, and Dallas. The final section considers data from the no match list pertaining to registered voters with inadequate identification.

EXECUTIVE SUMMARY

8. The time required to travel to and from a DPS office can pose a significant obstacle for voters to obtain an EIC, with the burden falling most heavily on potential voters who lack access to a motor vehicle. The cities of Houston, San Antonio, and Dallas contain more than half of the census tracts in Texas in which more than 25% of households do not have access to a motor vehicle. In Houston, San Antonio, and Dallas, these tracts are overwhelmingly populated by African Americans and Hispanics and exhibit high rates of poverty. The use of the public bus system increases trip travel time several fold over the use of a motor vehicle. While temporary offices reduce travel times, their highly limited deployment minimizes if not negates any ameliorative effect. The analysis of the no match list indicates that many registered voters do not have the identification needed to cast a regular ballot in person at the polls. Should these voters cast provisional ballots they would face additional travel burdens while trying to have their ballots accepted.

DEMOGRAPHIC OVERVIEW OF TEXAS

9. The population of the state of Texas was 25.1 million in 2010, nearly 4.3 million or 20.6% greater than it had been in 2000. With respect to Texas's three largest demographic groups, the Anglo population grew by only 4.2%, whereas the African American population grew by 22.1% and the Hispanic population grew by 41.8%. The 2.8 million additional

Hispanic Texans accounted for 65% of the State's total population growth between 2000 and 2010. General population statistics are provided in Appendix 1 in this report. The shorter tables in the text are excerpted from the more comprehensive tables located in this Appendix.

10. In 2000, 52.4% of Texas residents were Anglos. The proportion fell to 45.3% in 2010, making Texas one of four majority-minority states in the United States. During the same period Hispanics grew from 32.0% to 37.6%, and African Americans grew from 11.3% to 11.5% of the State's total population.

11. Texas has nearly 15.3 million residents who are both U.S. citizens and 18 years of age or older, the citizen voting-age population (CVAP). Anglos constitute 57.6% of this group, followed by Hispanics at 25.5% and African Americans at 12.7%.

12. Anglos, Hispanics, and African Americans have different patterns of geographic distribution in Texas. The counties with the highest proportions of Anglos are located in East and North Texas, those with the largest proportions of African Americans are located in the eastern third of the State, and those with the highest proportions of Hispanics are found along the State's southern boundary. It is further important to note that population densities vary widely across Texas, with the greatest population concentrations in the eastern third of the State, including the cities of Austin, Dallas, Fort Worth, Houston, and San Antonio.

13. According to the 2006-2010 ACS, nearly 14% of all U.S. citizens residing in Texas had incomes below the poverty level during that period. Rates of poverty differed significantly between racial groups. While only 8.5% of the Anglo U.S. citizens in Texas had incomes below the poverty level, over 18% of Hispanic citizens and nearly 23% of African American citizens had incomes below the poverty level. Geographically, the counties with the

highest rates of poverty are in the far western portion of Texas and along the southern border with Mexico.

14. According to the 2006-2010 ACS, 6% of Texas household units had no access to a motor vehicle with access varying between racial groups. Thus, while 7.5% of Hispanic household units and 13.4% of African American household units did not have access to a motor vehicle, less than 4% of Anglo household units had no access to a motor vehicle.

Figure 1: State of Texas, Anglo Population

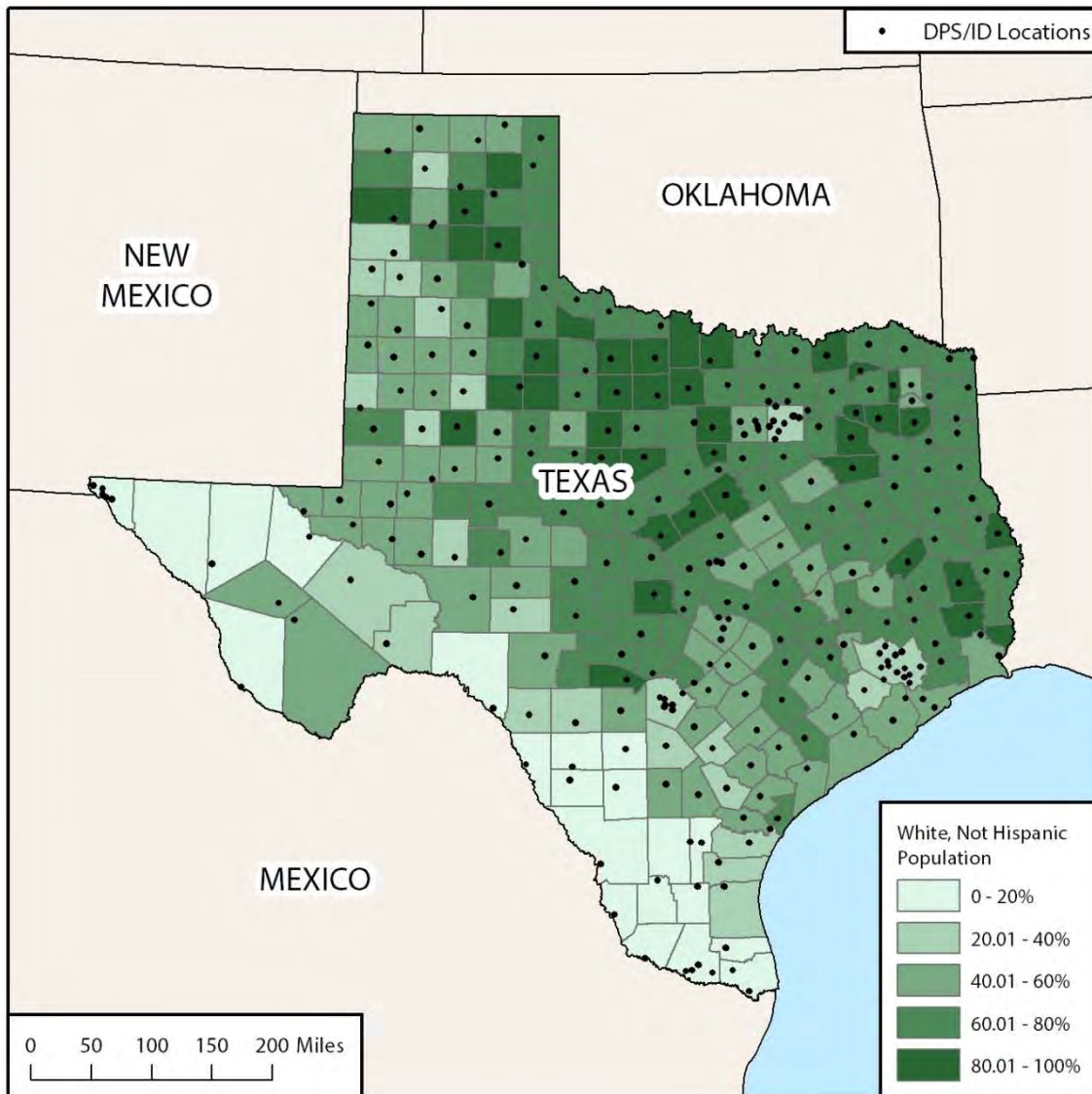


Figure 2: State of Texas, Black Non-Hispanic Population

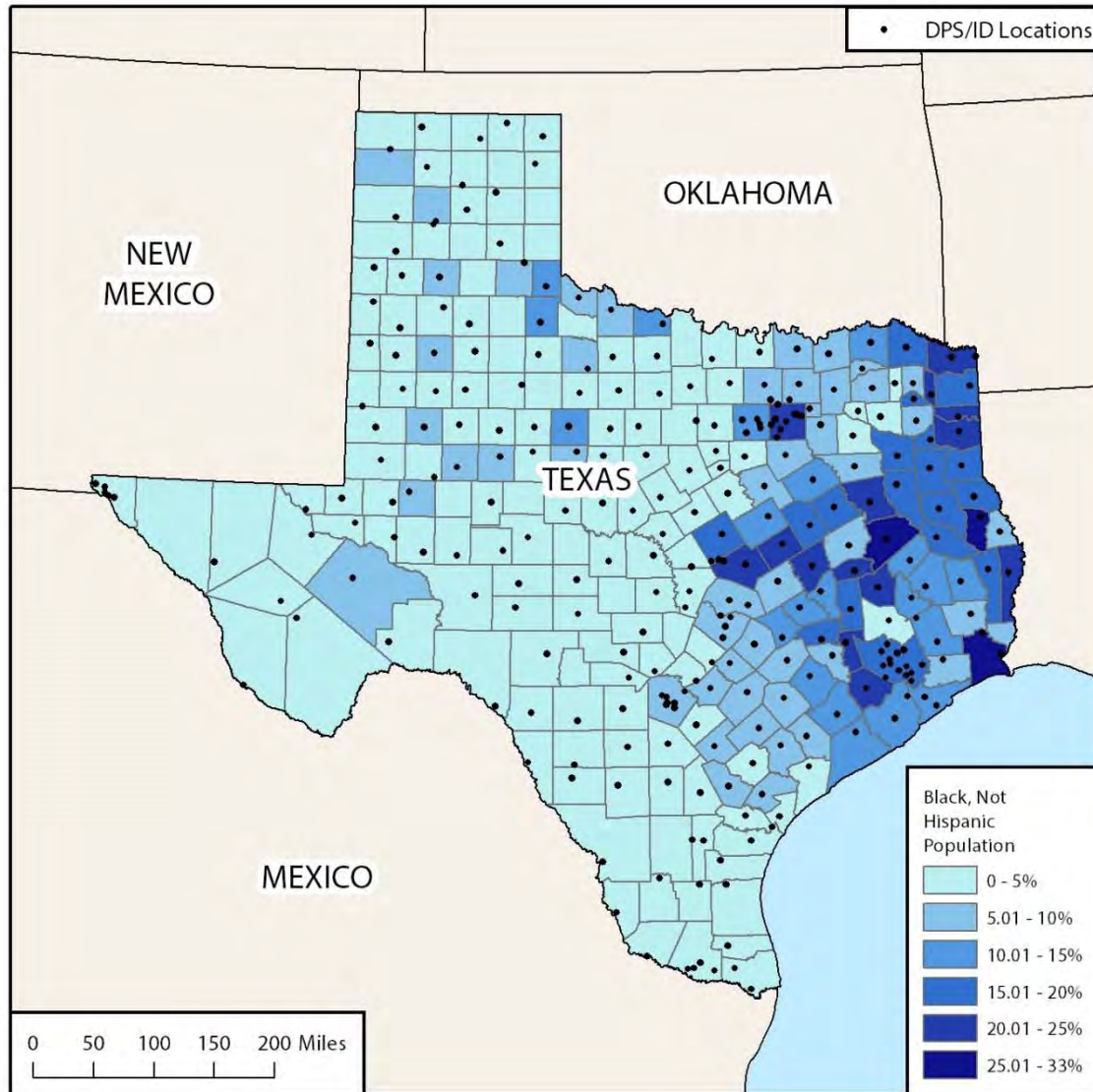


Figure 3: State of Texas, Hispanic Population

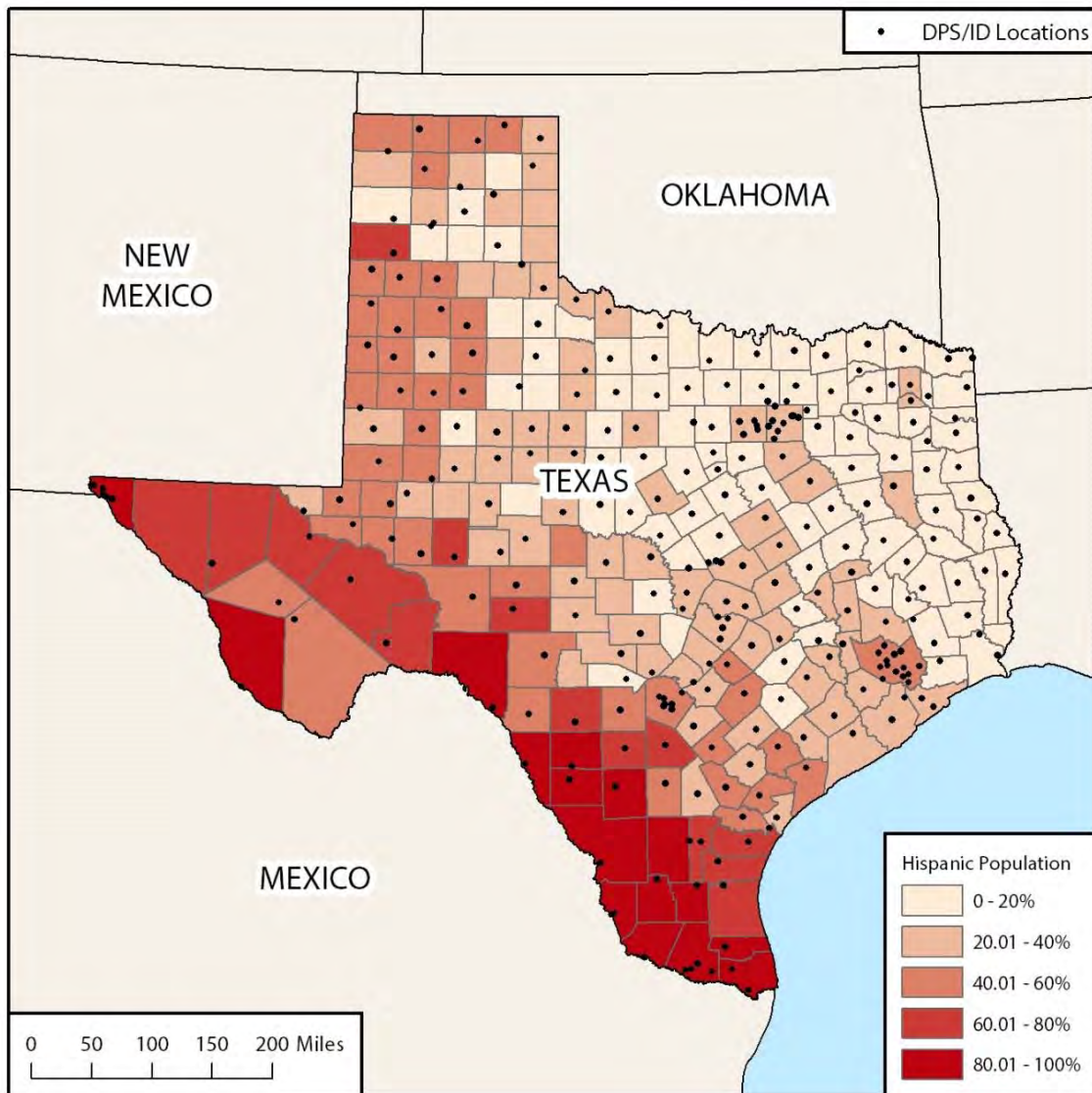


Figure 4: State of Texas, Poverty Rate

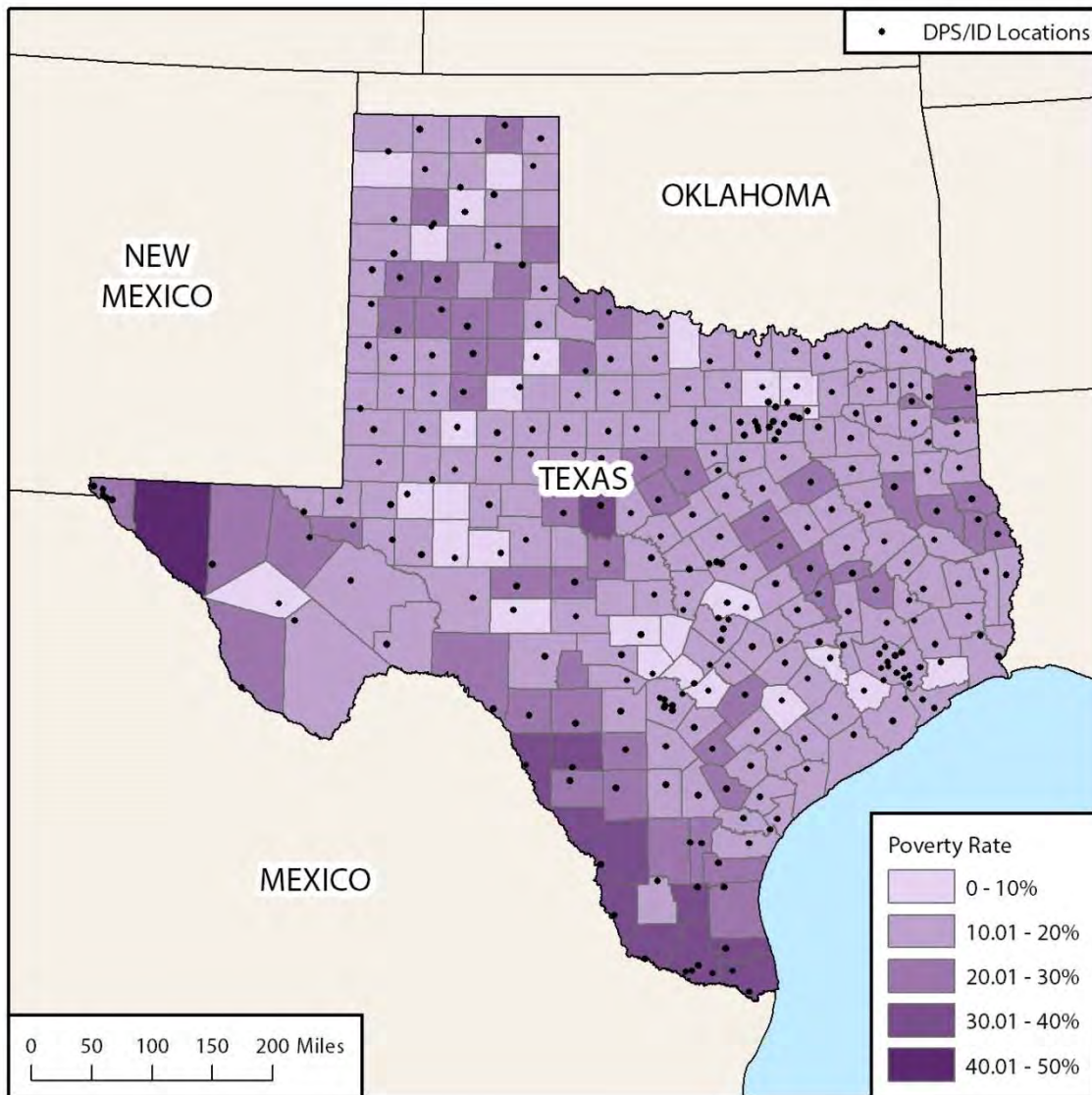


Figure 5: State of Texas, Occupied Housing Units Without Vehicle Access

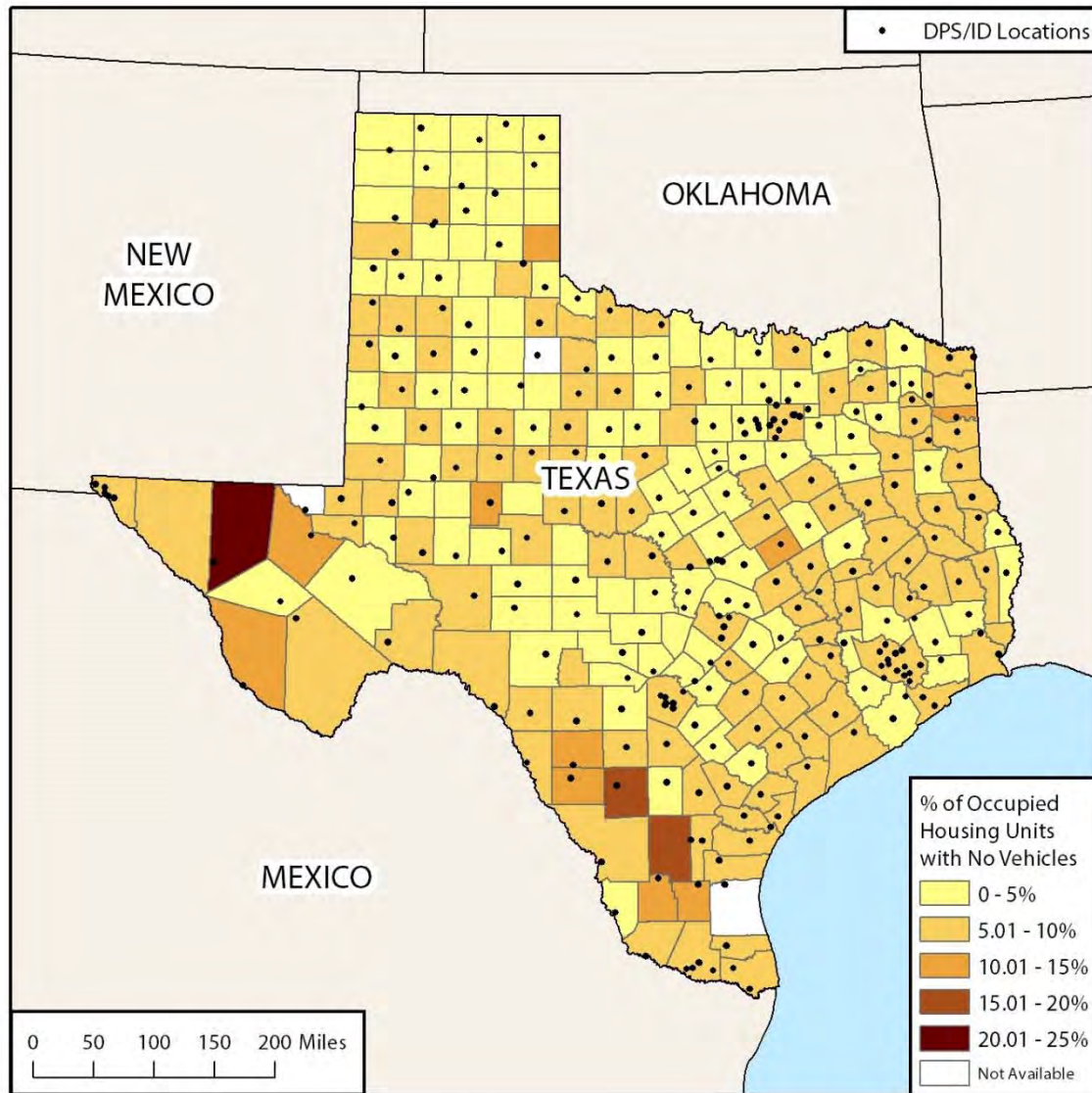


Table 1: Selected Statewide Poverty Statistics by Race

	Citizen Poverty Rate	Percent Household Units without Vehicle Access
Anglo	8.6%	3.7%
Hispanic	23.8%	7.5%
African American	23.5%	13.4%

Source: American Community Survey Five-Year Estimates 2006-2010, Tables, B17025 & B25044

SB 14: TEXAS'S PHOTOGRAPHIC VOTER IDENTIFICATION LAW

15. The implementation of SB 14 requires voters coming to the polls to provide one of seven different forms of identification:

- 1) Texas driver license
- 2) Texas election identification certificate
- 3) Texas personal identification card
- 4) Texas concealed handgun license
- 5) United States military identification card containing the person's photograph
- 6) United States citizenship certificate containing the person's photograph
- 7) United States passport

See Texas Secretary of State's Office, *Texas Voting*, <http://www.sos.state.tx.us/elections/pamphlets/largepamp.shtml> (last accessed June 8, 2014). The Texas Department of Public Safety issues Texas driver licenses, EICs, personal identification cards, and concealed handgun licenses.

16. There are 225 DPS Office locations around the state of Texas. Of this number, eight are located in Dallas County including two located in the city of Dallas; twelve are located in Harris County including seven located within the city limits of Houston; and five are located in Bexar County including three within the city limits of San Antonio. Depending on location, these offices can be open on different days of the week and for different time periods on those days.

17. Texas has 254 counties, and approximately 80 of these counties have no Department of Public Safety Office that issues photographic identification. Thus, citizens in these counties wishing to secure the identification from a DPS Office needed to cast a valid in-person ballot under SB 14 would be required to travel to another county to do so.

18. Possibly as a result, as of mid-June 2014, the State has enlisted 61 local government offices around the state to accept applications for Election Identification Certificates (EICs). I have reviewed declarations from officials in 44 of these 61 offices in

order to assess the effectiveness of this arrangement. Copies of these declarations are attached to my report as Appendix 3.

19. EIC applications had been accepted in only 11 of these 44 local government offices from June 2013 until the date of the declarations in April, May or June 2014. These 11 local government offices accepted a total of 40 EIC applications. Notably, eight of these offices accepted three or fewer EIC applications, and none accepted more than nine applications. This result is highly suggestive of implementation problems.

20. The State has also developed mobile units that serve as temporary locations at which potential voters may apply for an EIC. Since January 1, 2014, the State deployed two mobile units in Houston for two different two-day periods, one mobile unit in San Antonio for one two-day period, and one mobile unit visited Dallas for one day.

METHODS

21. Participation in elections carries costs for voters, with greater costs generally leading to greater rates of non-participation. As stated by Anthony Downs in his classic 1957 book *An Economic Theory of Democracy*, “time is the principal cost of voting: time to register, to discover what parties are running, to deliberate, to go to the polls, and to mark the ballot. Since time is a scarce resource, voting is inherently costly” (p. 265). Downs goes on to state that the monetary costs associated with voting include the “cost of transportation” and that the “Ability to bear these costs varies inversely with income, so upper income citizens have an advantage. . . . If the time must be taken out of working hours, this cost can be quite high, in which case high-income groups again have an advantage” (p. 266). Thus, participation in the

political systems carries costs, and these higher costs can lead to higher rates of non-participation, particularly among lower-income citizens.

22. Also pertinent and parallel to Downs' work are well established principles in geography pertaining to the effects of overcoming distance in terms of time and money. Of note is Edward Ullman's classic 1954 article entitled *Geography as Spatial Interaction*. Spatial interaction is the movement of a person or good from an origin to a destination. In the case of a potential voter who possesses the identification required by SB 14, the origin is their residence and the destination is the polling place. In the case of a potential voter who needs to obtain an EIC, the origin is their residence and the destination is a DPS Office, a county office that has agreed to accept EIC applications, or a DPS mobile unit. Ullman concluded that spatial interaction will not occur if the time or monetary costs of overcoming distance are judged too great. With regard to voting, each potential voter determines whether he or she has at their disposal the time and monetary resources needed to meet the costs associated with participating in the political process. The concept of distance decay establishes a direct decrease in the interaction between two places as the distance between them increases. Thus, a voter living only a five-minute walk from a location accepting EIC applications is more likely to obtain an EIC than one needing hours to travel to and from a DPS location.

23. Access to a motor vehicle provides potential voters greater flexibility in their efforts to secure needed identification and to travel to a polling site than someone without access to a motor vehicle will have. In total there are 138 census tracts in Texas where more than 25% of the household units do not have access to a motor vehicle. Notably, 78 (56.5%) of these census tracts are located in the three largest cities in Texas: Houston, San Antonio, and Dallas. As noted earlier, 6.0% of all household units in the state of Texas do not have access to a motor

vehicle. Thus, the 25% or above cut off point for more focused analysis of the census tracts is over four times greater than the statewide proportion, and many potential voters in these tracts may be directly affected by the ID law. Therefore, this analysis focuses on these three cities.

24. With regard to each city, I first present citywide data on poverty, household unit access to a motor vehicle and race/ethnicity to allow for internal and external comparisons. I next discuss the travel distance and time to a DPS Office by motor vehicle from all census tracts within each city. I then focus on those census tracts in which more than a quarter of the household units have no access to a motor vehicle, comparing motor vehicle and public bus travel times to the nearest DPS Office. I then present a comparison of the time needed to travel by motor vehicle or public bus to one of the mobile DPS Offices deployed between January 1 and May 15, 2014, from the centroids (or geographic center) of the tracts with more than a quarter of their households having no access to a motor vehicle. Finally, the data from the no match list is considered as it relates to registered voters who do not have appropriate identification to cast an in-person ballot.

25. The distance to the nearest DPS Office was calculated for all U.S. citizens of voting age for all census tracts in the three cities. This calculation was completed with ArcGIS's Network Analyst extension at the census tract level using the distance from each tract's centroid as calculated by the Census Bureau to the nearest fixed DPS Office providing acceptable identification to vote. Because census tract boundaries do not necessarily follow the municipal boundary, all census tracts having centroids inside the municipal boundary were included in the calculations. The ArcGIS Network Analyst extension software searches for the nearest road or highway to the centroid of the tract and then calculates the distance in miles to the nearest DPS

Office. The Network Analyst extension was also used to calculate the motor vehicle travel time from the centroid of the tract to the nearest DPS Office.

26. The travel distance and time by motor vehicle to the nearest DPS Office is largely irrelevant to a potential voter residing in a household unit without access to a motor vehicle. However, each of the three cities examined has a well-developed bus system. Focusing on the tracts in each city in which more than a quarter of the household units have no access to a motor vehicle, bus system websites were used to calculate an estimated bus trip time from the bus stop nearest an individual's residence to the bus stop nearest the closest fixed DPS Office location. In later analysis mobile DPS unit locations were added to the assessment. To insure consistency, all bus trips were assumed to begin at 8:00 am on a weekday.

27. Finally, the tracts were subdivided into those that are plurality or majority Anglo, Hispanic or African American to identify those communities most potentially affected by the ID law.

DIFFERENTIAL EFFECTS IN SELECTED CITIES

28. This section of the report examines the likely differential effects of the Texas ID law between Anglos, Hispanics and African Americans focusing on household unit access to a motor vehicle and poverty in the state's three largest cities. I specifically focus on those census tracts in which at least 25% of household units do not have access to a motor vehicle, referred to below as "low vehicle access tracts."

29. This analysis finds that in the three largest cities in Texas members of the African American and Hispanic communities who seek to obtain an EIC are much more likely than members of the Anglo community to face substantial burdens. This finding is based primarily

upon the analysis of the 77 census tracts in Houston, San Antonio, and Dallas in which more than one-quarter of household units did not have access to a motor vehicle (a 78th tract in San Antonio was dropped from the analysis because it included Bexar Adult Detention Center). In addition to limited access to a motor vehicle, these census tracts are overwhelmingly populated by African American and Hispanic citizens of voting age as a proportion of all citizens of voting age. Of the 77 tracts in which more than a quarter of the household units did not have access to a motor vehicle, only two had majority or plurality Anglo citizen voting age populations. These 77 census tracts are also characterized by high rates of poverty.

30. Travel times to the nearest DPS Office were calculated from the centroids of the 77 low vehicle access tracts. Estimated one way motor vehicle travel times from the centroids of the 30 tracts in Houston to the nearest DPS Office averaged 10.5 minutes. The parallel estimate for the 21 tracts in San Antonio is 7.5 minutes, and for the 26 tracts in the Dallas the estimated mean one way travel time is 12.8 minutes. For potential voters in these tracts that must rely on bus travel to secure the proper identification the one way travel times are substantially longer at 66.7 minutes in Houston, 36.2 minutes in San Antonio, and 59.7 minutes in Dallas. Thus, one-way travel time in Houston for bus riders is 6.3 times longer than for one-way motor vehicle travel to the nearest DPS Office. Similarly, bus riders from these tracts in San Antonio will spend 4.8 times longer, and those in Dallas will spend 4.7 times longer in transit than those with access to a motor vehicle.

31. Mobile offices accepting EIC applications visited all three cities between January 1 and May 15, 2014. Two mobile units visited Houston for two days, one mobile unit visited San Antonio for two days, and one mobile unit visited Dallas for one day. The temporary geographic locations selected for these mobile units did reduce mean motor vehicle and mean

bus rider travel time from the low vehicle access tracts in the three cities. But the allocation of these mobile offices to the three cities was so limited as to call in to question the benefits of their use.

32. The location of the mobile units did reduce motor vehicle and bus travel time. For example, mean motor vehicle travel time in Houston fell from 10.5 minutes to 7.9 minutes, and public bus travel time fell from 66.7 minutes to 44.6 minutes. Similarly, motor vehicle and bus travel times fell in San Antonio and Dallas. But significant differentials continue to exist with bus riders spending 5.6 times more time than those with access to a motor vehicle in Houston to travel to a DPS Office. In San Antonio bus riders would spend 6.4 times more time in-transit than drivers and in Dallas the ratio is 4.3 times more time. These reductions notwithstanding, the mobile units were deployed for such a short time period that their value is questionable.

Table 2: Average Travel Time In Minutes to Obtain an EIC from
Low Vehicle Access Tracts in Texas's Three Largest Cities

Average Travel Time from Low Vehicle Access Tracts in Minutes	Car	Bus	Car (Including Temp. Locations)	Bus (Including Temp. Locations)
Houston	10.5	66.7	7.9	44.6
San Antonio	7.5	36.2	4.9	31.3
Dallas	12.8	59.7	7.8	33.5

Sources: Calculations were made using the ArcGIS Network Analyst extension and the municipal bus websites of the three cities.

Houston

33. The city of Houston is located in Harris County and is the largest city in Texas, with a 2010 population of 2.1 million of the State's 25.2 million residents and a 2006-2010 ACS estimated citizen voting-age population of 1.2 million individuals. The latter total includes

445,232 Anglos (38.9%), 349,419 African Americans (30.5%) and 281,506 Hispanics (24.6%).

34. The residential patterns of these three groups differ in Houston. Census tracts with large proportions of Anglos are found in a corridor on the western side that runs from near the center of the city to the western edge of Houston, while tracts with large proportions of Non-Hispanic African Americans are found in the northeastern and south-central portions of Houston. The tracts with the largest proportions of Hispanics are found in the far eastern and north central portions of the city.

35. Houston's poverty rate differs among the three demographic groups. While 19.4% of the U.S. citizens in Houston had incomes below the poverty level 2006-2010, the rate among Anglo citizens was 7.3%, the rate for Hispanic citizens was 24.9% and the rate among African American citizens was 27.6%. The geographic areas with the largest rates of poverty are located in the eastern third of Houston, generally including census tracts with larger proportions of African American or Hispanic populations.

36. Household access to a motor vehicle also differs in Houston by demographic group. While 10.1% of all Houston household units had no access to a motor vehicle in 2006-2010, the rate for Anglo housing units was under 5%. The rate was nearly 18% for African American housing units and 10% for Hispanic household units. Not surprisingly, given the geographic pattern of poverty in the city, the census tracts with the largest proportions of

household units without access to motor vehicles are located in the eastern portion of Houston including census tracts with high concentrations of African Americans and Hispanics.

Table 3: Citizen Voting Age Population (CVAP), Poverty and Vehicle Access in Houston by Race

	CVAP, Percent	Citizen Poverty, Percent	Household Units without Access to a Motor Vehicle, Percent
Anglo	38.9%	7.3%	4.9%
Hispanic	24.6%	24.9%	10.1%
African American	30.5%	27.6%	17.7%

Source: American Community Survey Five-Year Estimates 2006-2010, Tables, B05001, B17001, B17025 & B25044

37. The geographic distribution of DPS driver license offices or mobile units providing EICs is a key factor in determining whether groups are affected differently when trying to secure such identification. There are twelve DPS Offices in Harris County, with seven of these located in the City of Houston. Houston also had two mobile units visit on February 27th and 28th, 2014, which I will examine separately given their ephemeral character. The distance to the nearest DPS driver license office in Harris County for all U.S. citizens of voting age was calculated for all 458 census tracts in the city of Houston. The average distance to a DPS driver license office in Houston is 5.8 miles, and the estimated travel time by motor vehicle is 9.8 minutes. While the estimated travel time using a motor vehicle needed to visit the nearest DPS Office is small, it is unlikely that a potential voter without access to a motor vehicle would be able to easily walk to the nearest DPS Office.

Figure 6: City of Houston, Anglo Population

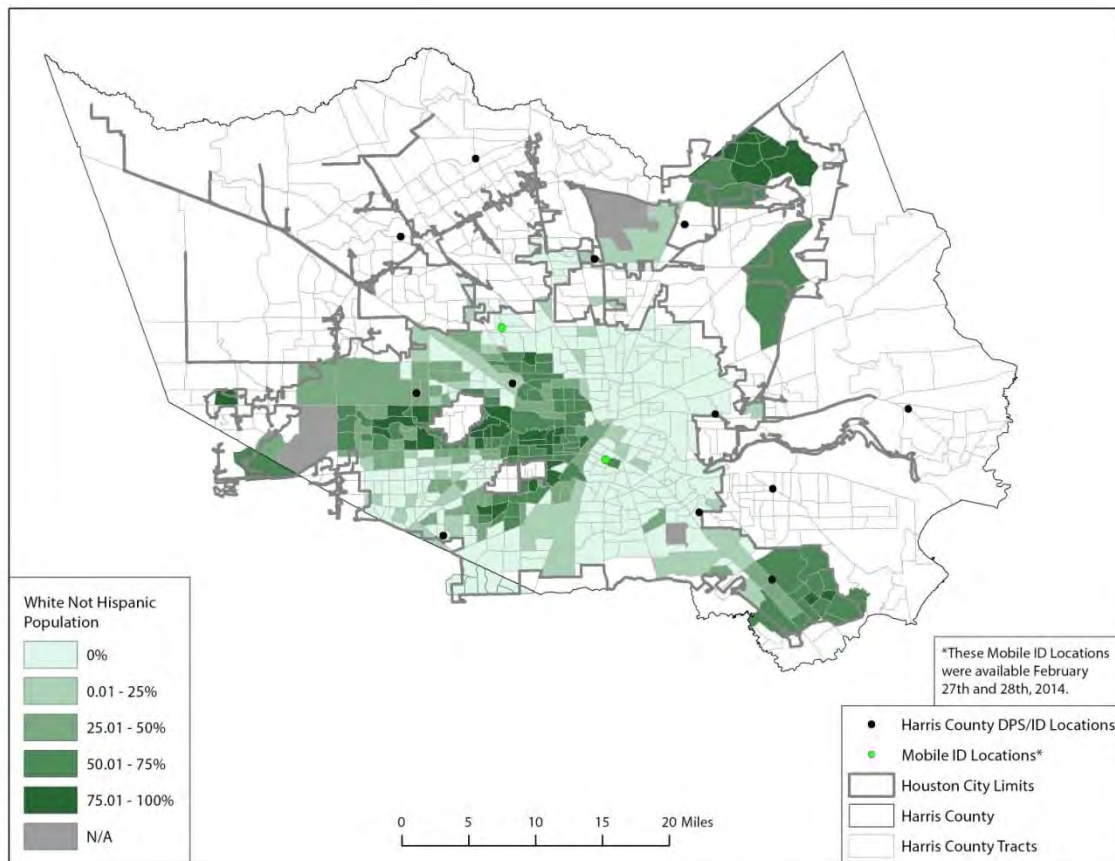


Figure 7: City of Houston, Black Non-Hispanic Population

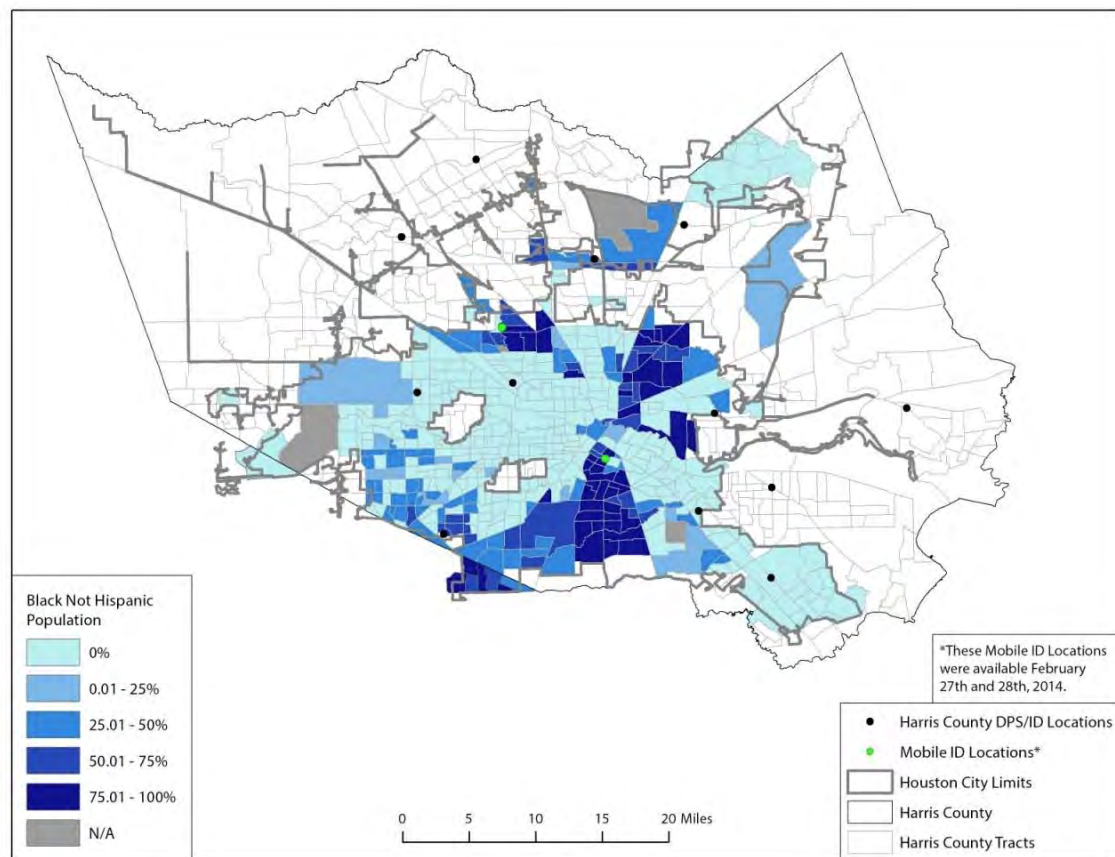


Figure 8: City of Houston, Hispanic Population

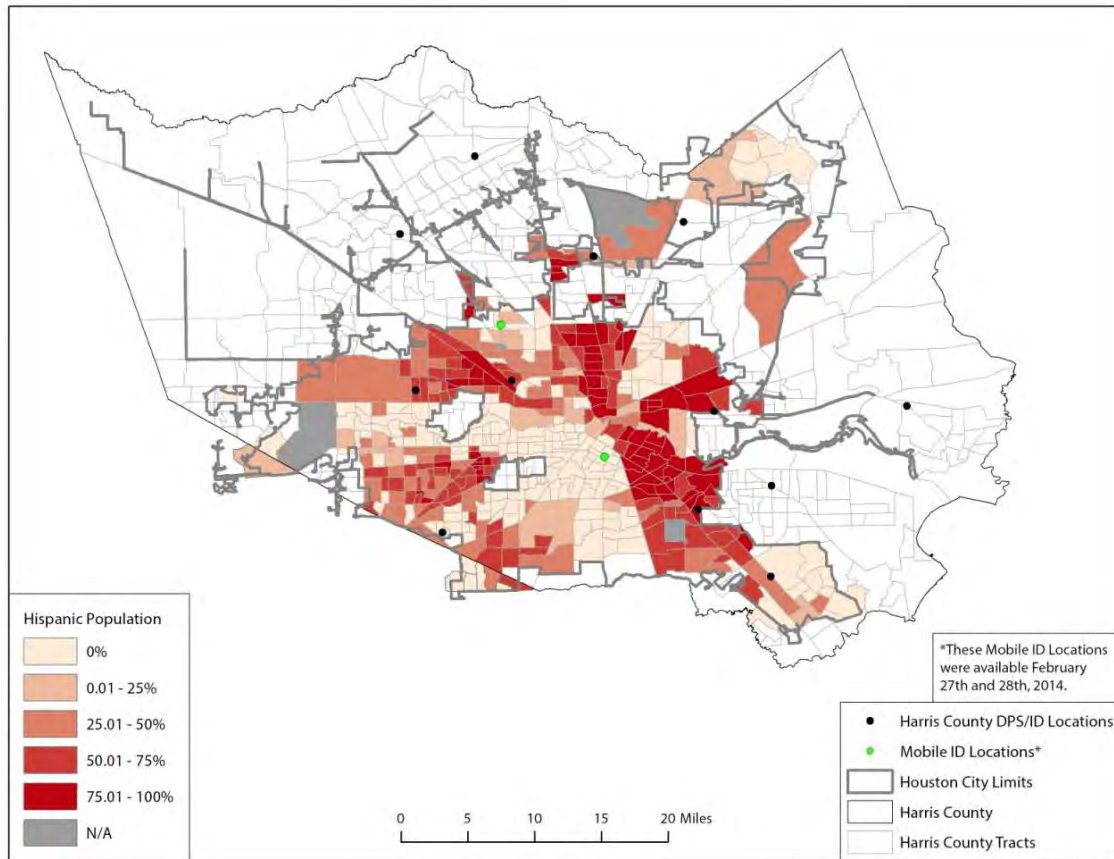


Figure 9: City of Houston, Poverty Rate

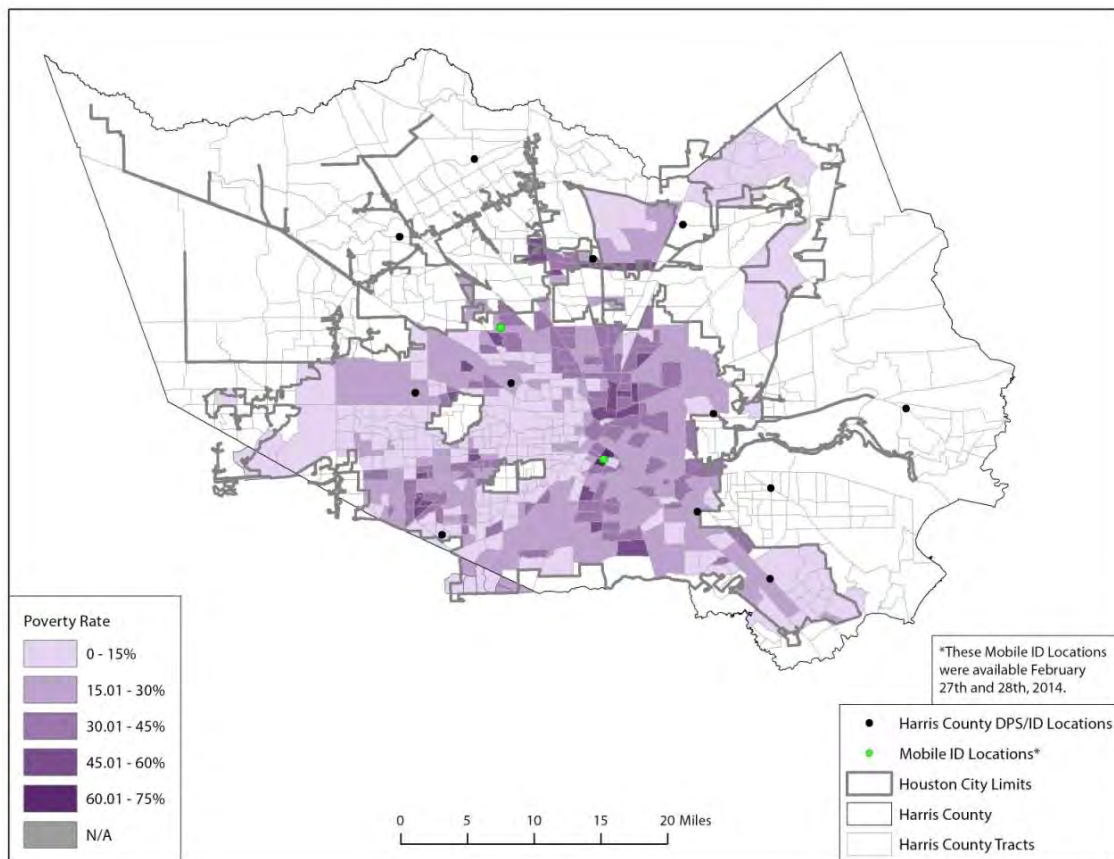


Figure 10: City of Houston, Occupied Housing Units Without Vehicle Access

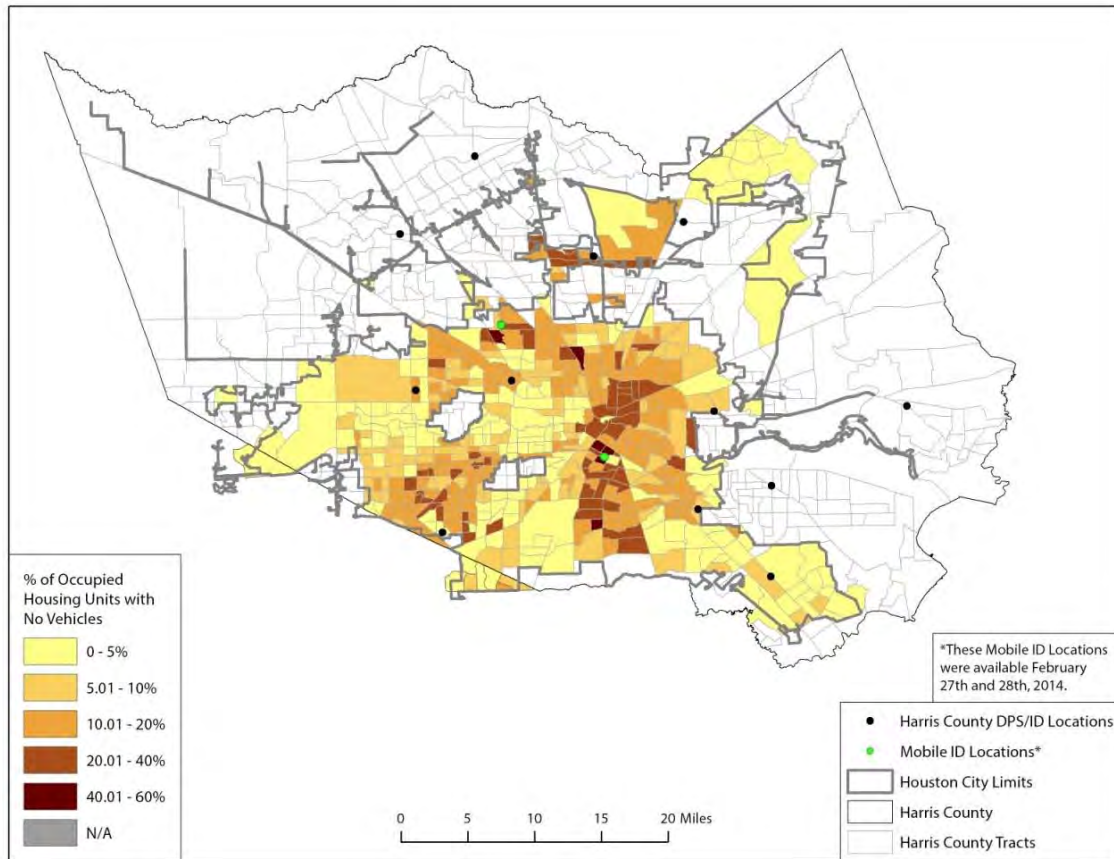


Figure 11: City of Houston, Low Vehicle Access Tracts

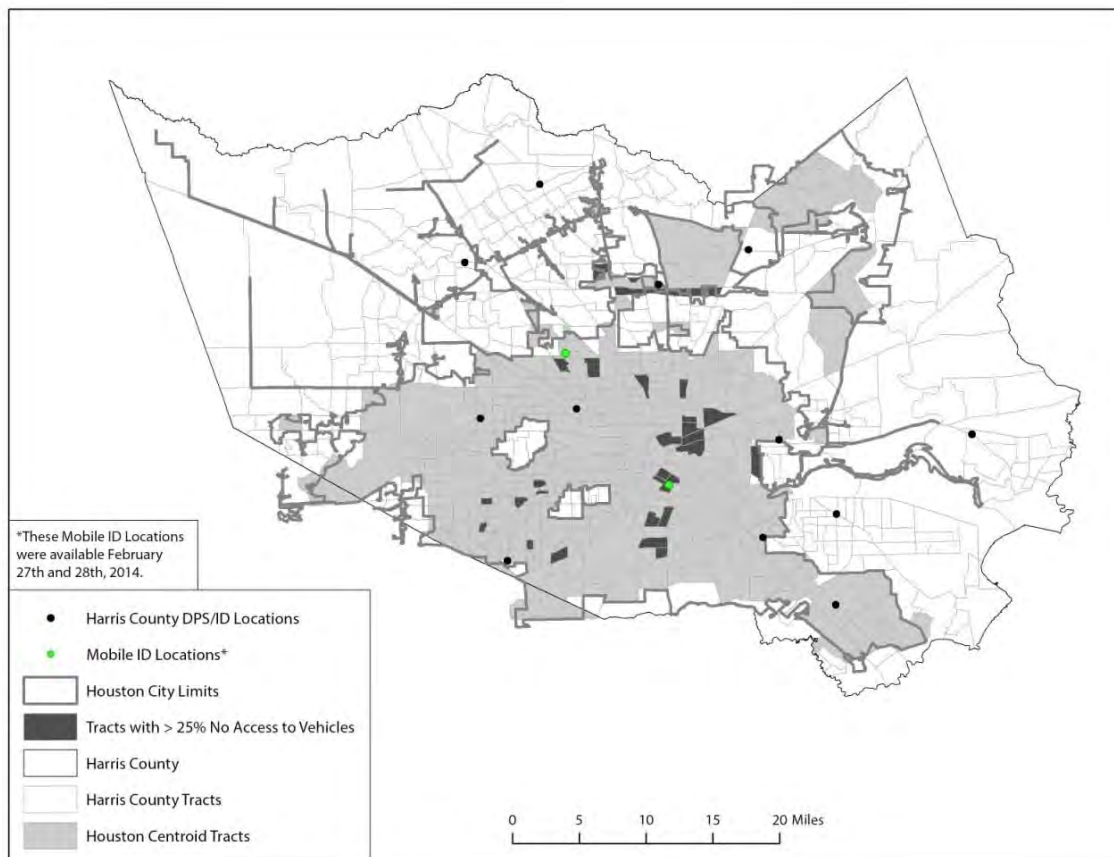
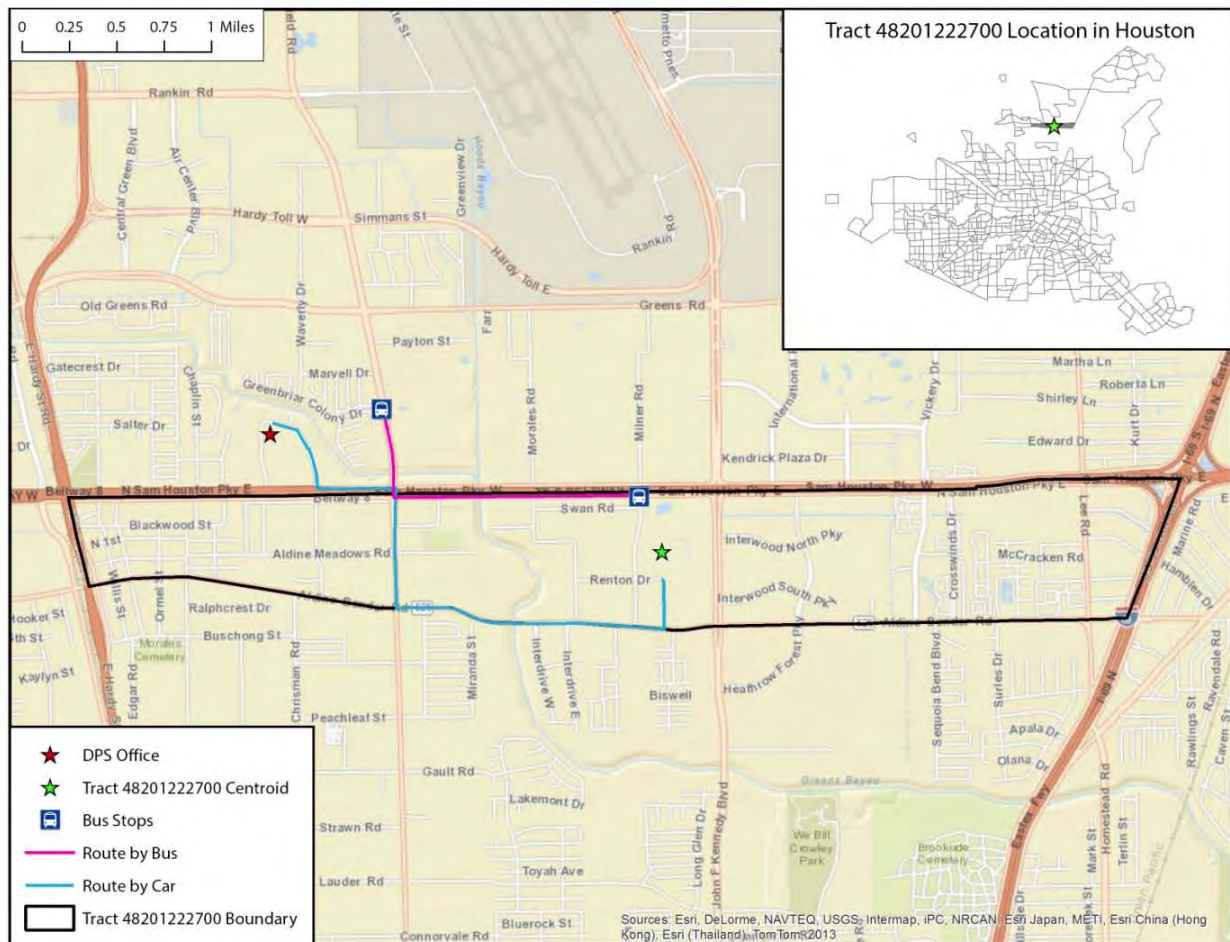


Figure 12: Sample Travel Routes by Car and Bus



38. Thirty census tracts were identified in the city of Houston with 25% or more of their household units having no access to a motor vehicle. Among these low vehicle access tracts, African American citizens constituted a plurality or majority of the citizens of voting age (CVAP) in twenty-three (including an 85% or greater supermajority in thirteen), Hispanics constituted a majority or plurality in six, and Anglos constituted a plurality in one. The tract in which Anglos are a CVAP plurality includes Bellerive, a public housing facility for senior citizens, which may artificially inflate the percentage of household units lacking motor vehicle access. In six of these 30 tracts, over 40% of household units did not have access to a motor

vehicle, with five of these six having citizen voting age populations more than 73% African American. In the sixth tract, fifty-one percent of all citizens of voting age were Hispanic.

39. In all low vehicle access tracts in which a plurality or majority of the CVAP is African American, the poverty rate for African Americans citizens was over 25%, and in fourteen of those tracts the African American citizen poverty rate was over 40%. In the low vehicle access tracts in which a plurality or majority of the CVAP is Hispanic, the poverty rate for Hispanic citizens was over 30%, and in two tracts the Hispanic citizen poverty rate was over 66%. In the sole low vehicle access tract in which a plurality of the CVAP is Anglo, the Anglo citizen poverty rate was much lower at 13.4%.

40. The average motor vehicle driving time to a fixed DPS driver license office from one of the 30 low vehicle access tracts in Houston is estimated to be 10.5 minutes. For those who lack access to a motor vehicle Houston has a well-developed and well-used mass-transit system. See METROBus and METRORail, Monthly Ridership Report, March 2014, http://www.ridemetro.org/News/Documents/pdfs/Ridership%20Reports/2014/0314_Ridership_Report_FY14.pdf. The average bus trip time from a low vehicle access tract in Houston to the nearest fixed DPS driver license office is estimated to be 66.7 minutes. A table setting out these figures for each of the low vehicle access tracts is included in Appendix 1.

41. The estimated bus travel times do not include that spent walking from a residence to the nearest bus stop, waiting for the next bus at the stop, and walking from the last bus stop to the DPS Office. For example, a potential voter residing in census tract 48201222700 would have to walk for 8 minutes to the nearest bus stop and for 16 minutes from the final bus stop to the closest DPS driver license office, according to Google Maps' walking direction estimates. Thus, while that potential voter's bus travel time would be only 4 minutes, the total time walking and

on the bus from a residence to the DPS Office in this tract is more accurately estimated to be 28 minutes, and this is only half the trip. And to reiterate, this estimate does not include time spent at the first bus stop waiting for the bus to arrive.

42. Temporary mobile units issuing EICs have been deployed in different locations around the state of Texas including Houston in both 2013 and 2014. Here I analyze those deployments from January 1 through May 15, 2014. Two mobile offices were deployed on February 27th and 28th with one being located at the Holman Street Baptist Church (3422 Holman Street, # B) and the second at Lone Star College System (4141 Victory Dr.).

43. Driving and bus travel times were recalculated for all DPS Offices and the two mobile units for February 27 and 28, 2014. The locations of the two mobile units did result in reduced travel times for the residents of 16 of the 30 census tracts. The mean travel time for residents of all 30 low vehicle access tracts fell from 10.5 minutes to 7.9 minutes, while bus travel time fell from 66.7 minutes to 44.6 minutes. Thus, the placement of the mobile units did have a positive effect. But the fact that the mobile units were only available for a total of two days calls in to question their benefits. Secondly, there remained a significant contrast between the travel time for those with access to a motor vehicle and those of necessity using the bus system with bus passengers spending 5.6 times more travel time one way to the nearest DPS Office or mobile unit providing a EIC. A table setting out travel times from each of the low vehicle access tracts to the nearest DPS Office including the mobile units as options is included in Appendix 1.

44. In sum, this analysis finds that low vehicle access tracts in Houston are largely populated by African Americans and Hispanics and that these tracts are also characterized by high rates of poverty. Economically poor potential voters without access to a motor vehicle can

use a city bus to travel to the nearest DPS Office, but the estimated mean trip travel times for the citizens in these tracts doing so is well over six times longer than for citizens in the same tracts with access to a motor vehicle. Although the temporary locations of the mobile units providing EICs in many cases reduced travel times for both motor vehicle drivers and bus passengers in the same census tracts, bus riders would still spend 5.6 times more travel time than those who have access to a motor vehicle. Secondly, the limited deployment of temporary locations calls into question their ability to mitigate barriers to obtaining an EIC.

Table 4: Travel Time to Locations to Obtain an EIC in Houston

One-Way Travel Time	All Tracts	Low Vehicle Access Tracts	Low Vehicle Access Tracts (including DPS Temporary Locations)
Minutes By Car	9.8	10.5	7.9
Minutes By Bus	n/a	66.7	44.6

Sources: Calculations were made using the ArcGIS Network Analyst extension and Ridemetro.org

San Antonio

45. The city of San Antonio is located in Bexar County and is the second largest city in Texas, with a 2010 population of 1,327,407 and a 2006-2010 ACS estimated CVAP of 844,260 residents. The latter total includes 286,551 Anglos (33.9%), 472,422 Hispanics (56.0%), and 59,344 African Americans (7.0%). Thus, San Antonio's eligible voter population is predominantly Hispanic, and it has a far smaller African American community than Houston.

46. Anglos, African Americans and Hispanics have distinct patterns of residence in San Antonio. Anglos dominate the northern third of the city with their largest concentrations in the north central portion of San Antonio. Concentrations of African Americans are found in a handful of census tracts in the far eastern central portion of the city. While concentrations of

Hispanics are located in all but the far northern portion of San Antonio, their largest concentrations are in the south central and southern parts of the city.

47. Eighteen percent of U.S. citizens living in San Antonio had incomes below the poverty level according to the 2006-2010 ACS, but there were significant contrasts between demographic groups. While nearly 22% of Hispanics and over 24% of African American citizens had incomes below the poverty level, only 9.4% of Anglos did. Poverty rates are generally greatest in the southern half of San Antonio, most particularly in some largely Hispanic areas and in some of the census tracts on the eastern margin of the city with large proportions of African Americans.

48. Household unit access to a motor vehicle differs substantially by demographic group in San Antonio. While nearly 17% of African American household units and 11% of Hispanic household units had no access to a motor vehicle 2006-2010, the rate for Anglo household units was 6%. Geographically those areas with the largest proportions of household units without access to a motor vehicle are found in the central portions of San Antonio, most particularly in census tracts dominated by Hispanics.

Table 5: CVAP, Poverty, and Vehicle Access in San Antonio by Race

	CVAP, Percent	Citizen Poverty, Percent	Household Units without Vehicle Access, Percent
Anglo	33.9%	9.4%	6.1%
Hispanic	56.0%	21.9%	10.8%
African American	7.0%	24.4%	16.6%

Source: American Community Survey Five-Year Estimates 2006-2010, Tables, B05001, B17001, B17025 & B25044

49. There were five fixed DPS Offices in Bexar County in mid-June 2014, with three of these located in the city of San Antonio. Additionally, one mobile unit visited San Antonio on Tuesday February 25th and Wednesday February 26th. The distance to a DPS Office was calculated for all U.S. citizens of voting age for all 285 census tracts in San Antonio. The average distance from all tract centroids to a DPS Office in San Antonio is 5.8 miles, and the estimated motor vehicle driving time is 9.9 minutes.

Figure 13: City of San Antonio, Anglo Population

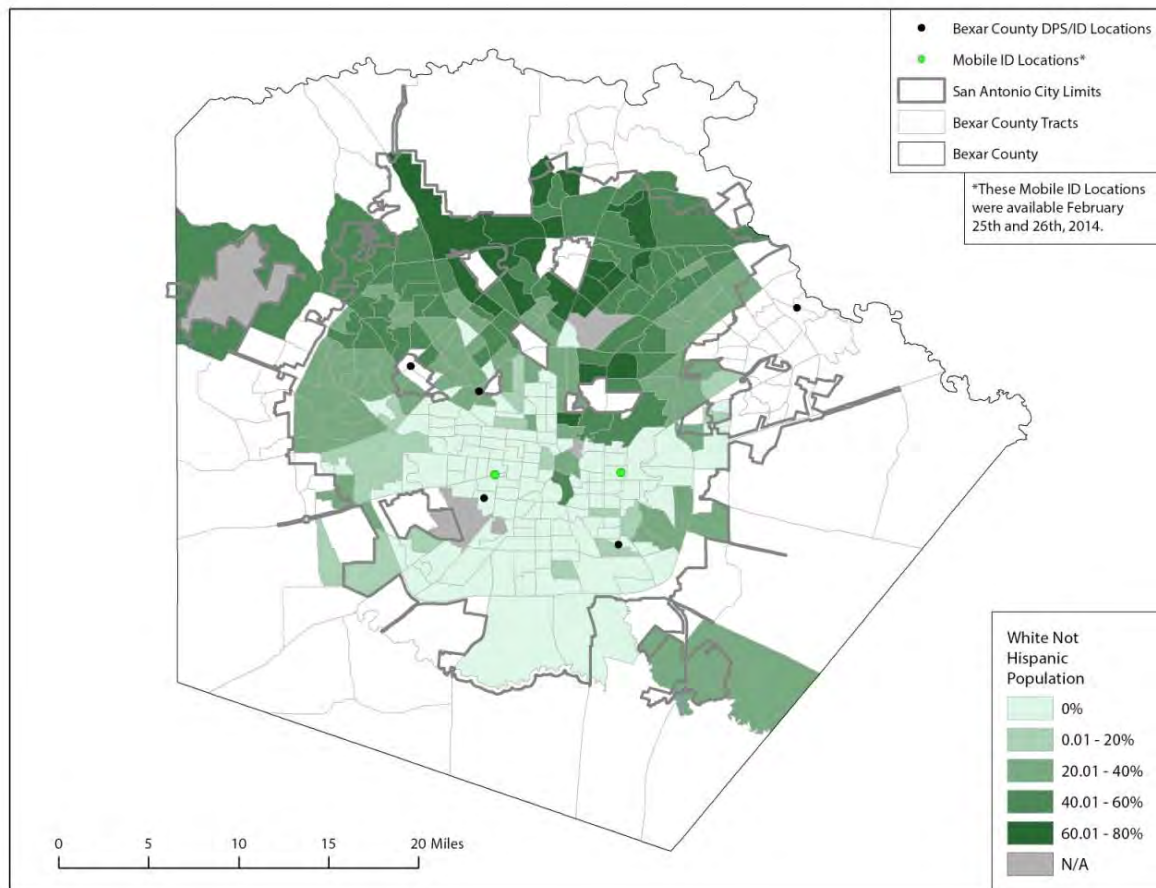


Figure 14: City of San Antonio, Black Non-Hispanic Population

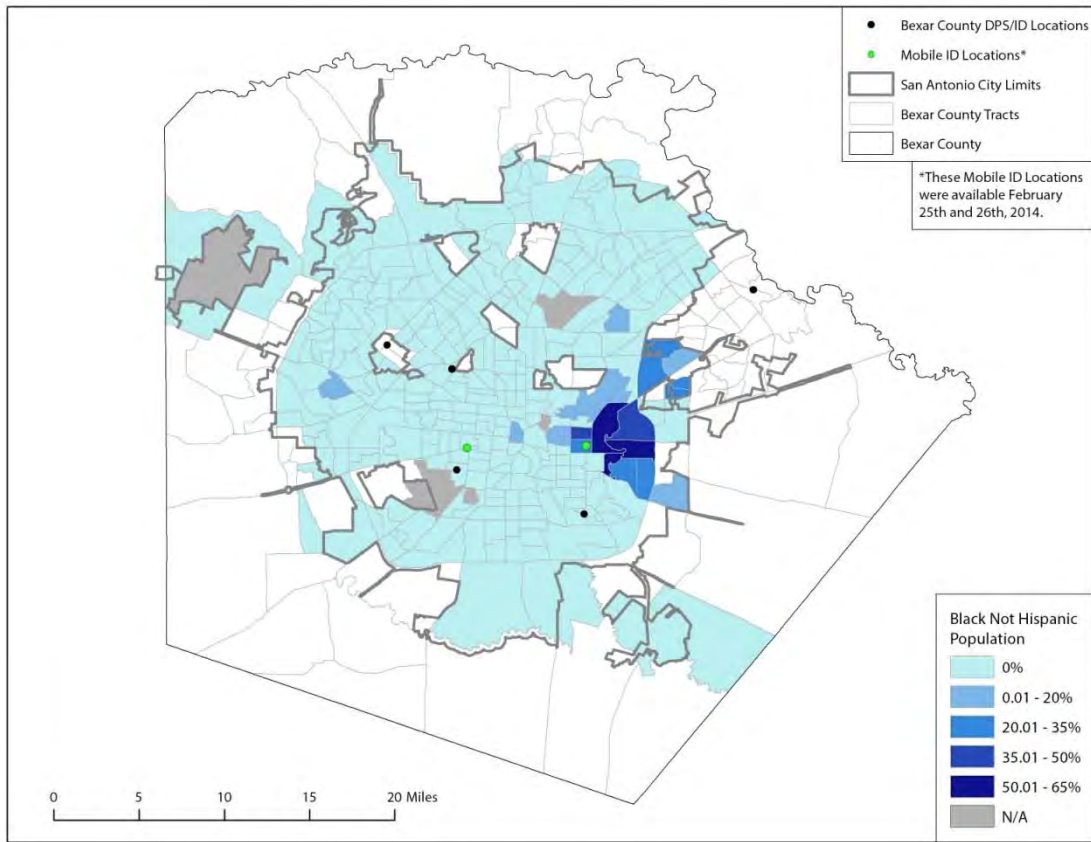


Figure 15: City of San Antonio, Hispanic Population

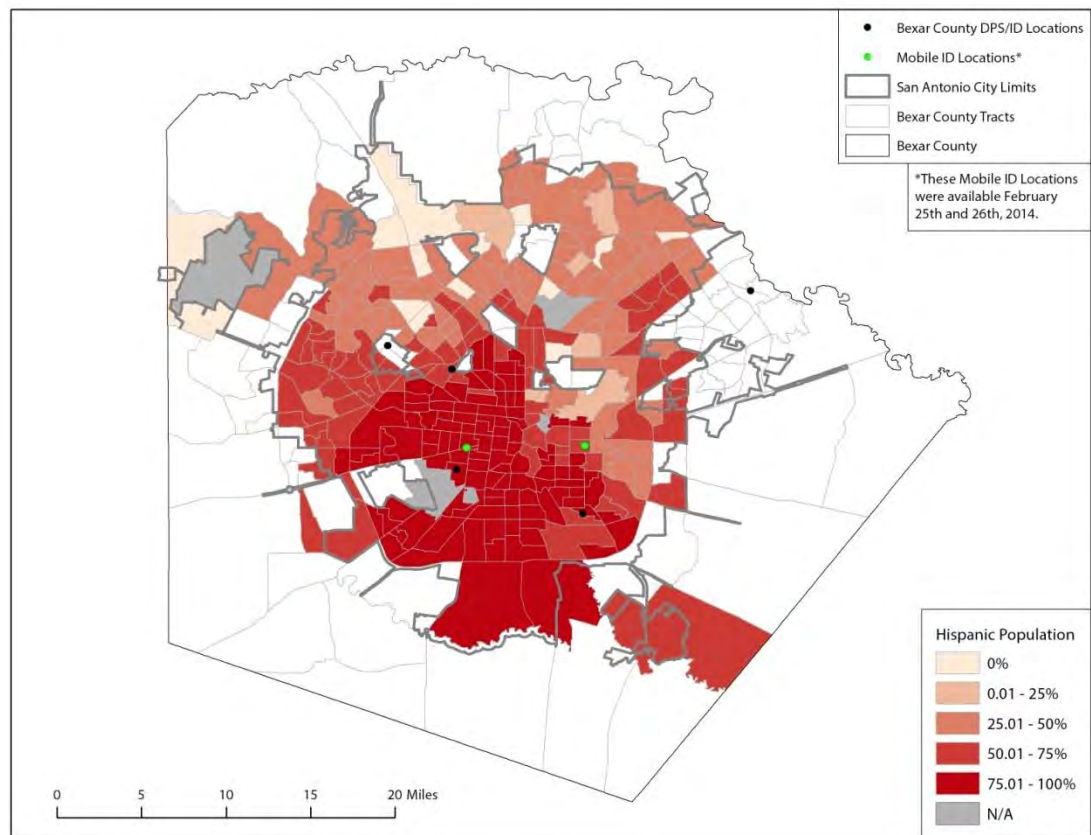


Figure 16: City of Houston, Poverty Rate

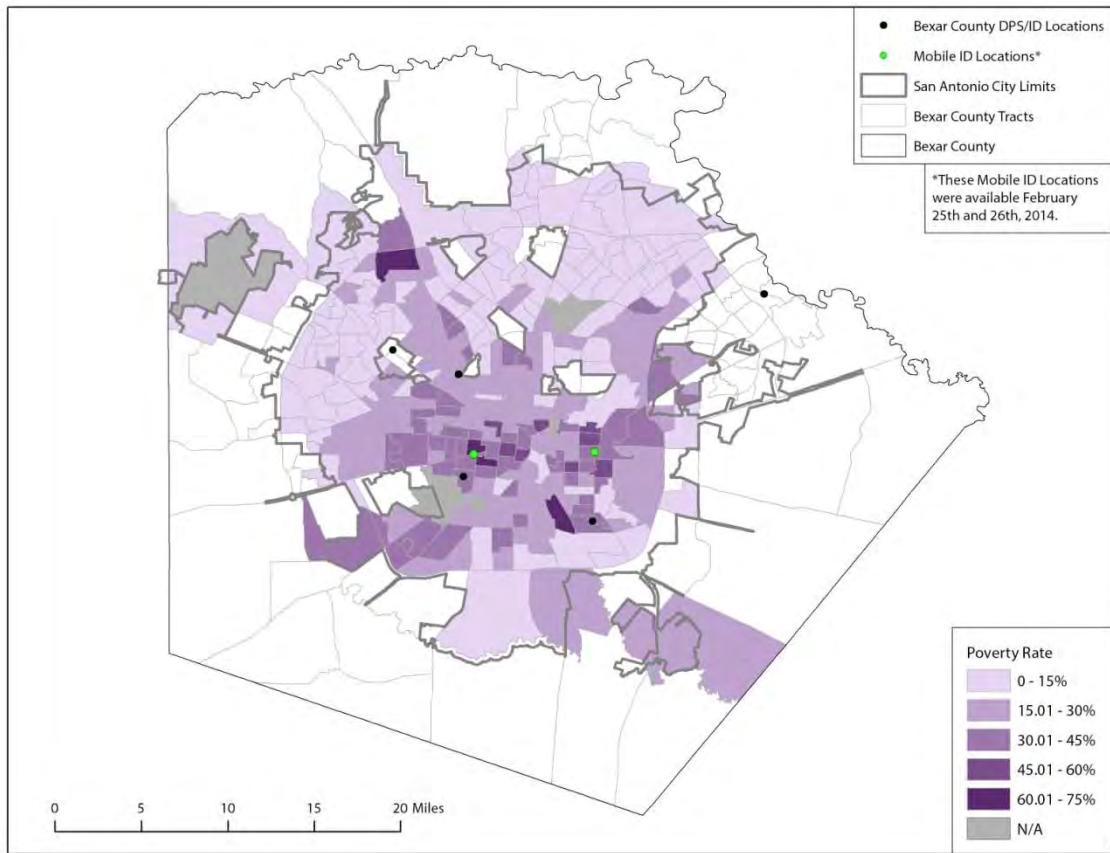


Figure 17: City of San Antonio, Occupied Housing Units Without Vehicle Access

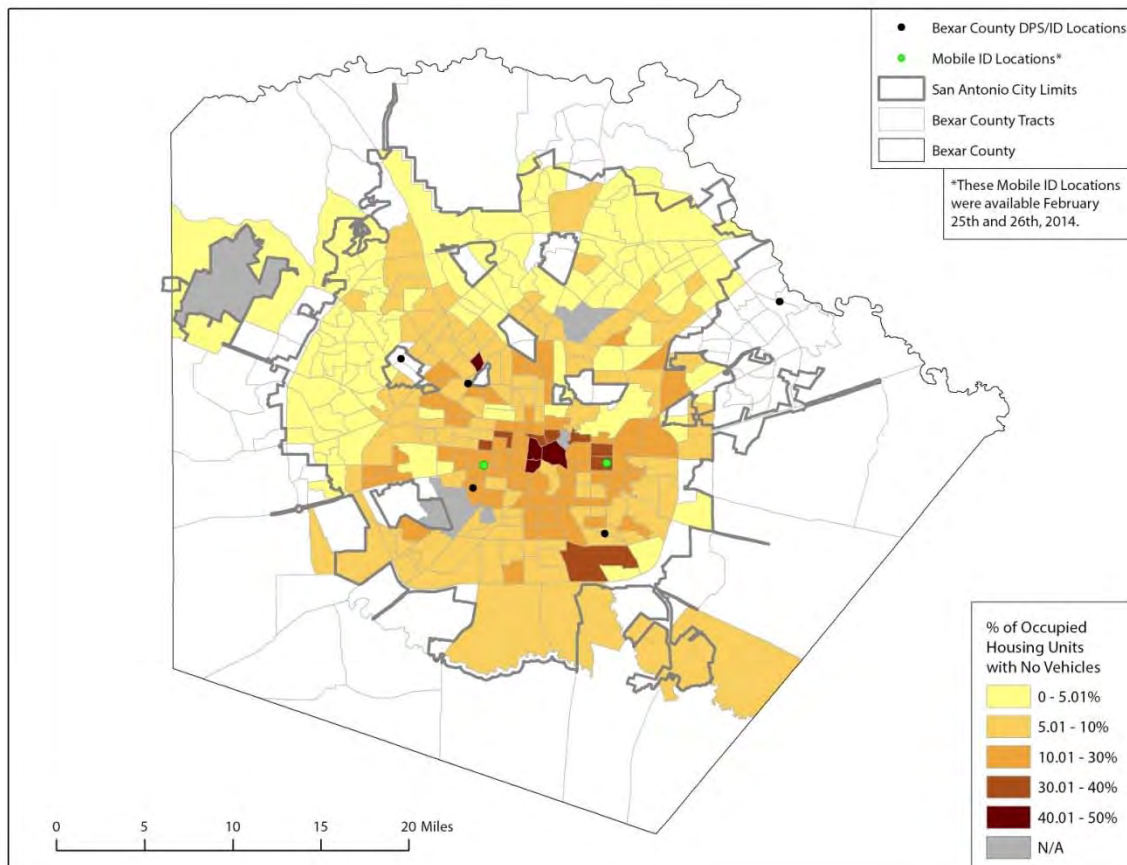
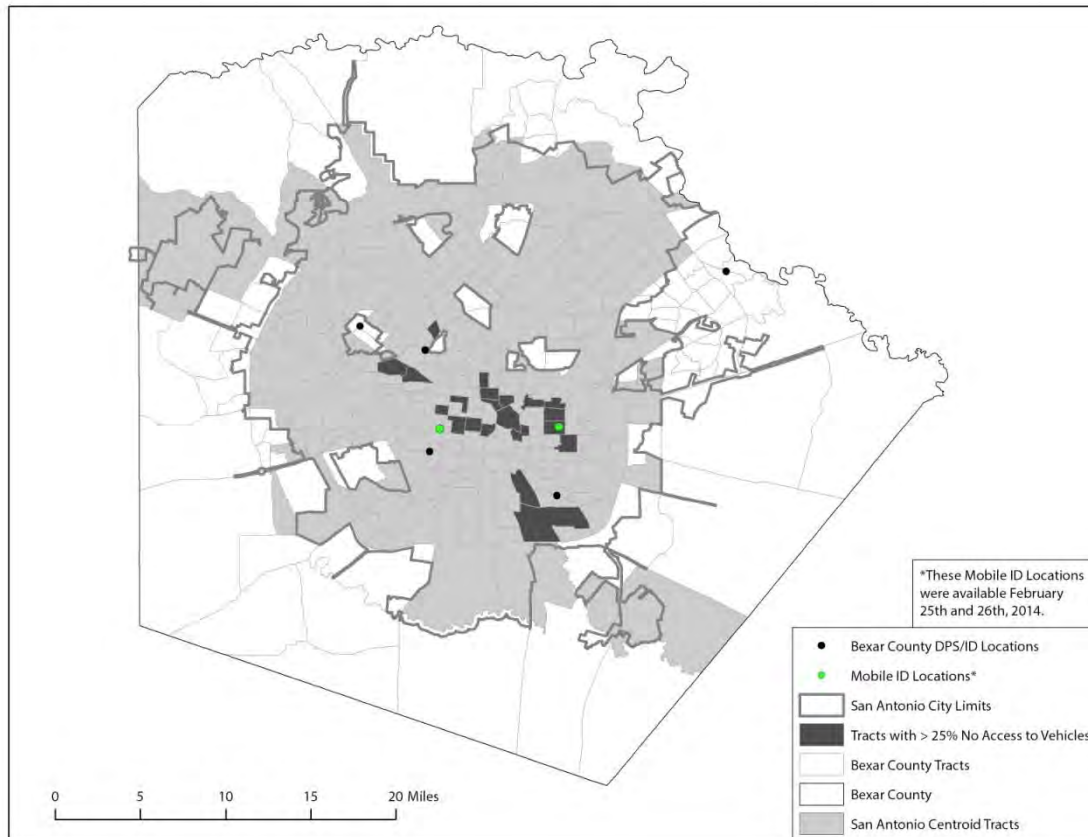


Figure 18: City of San Antonio, Low Vehicle Access Tracts



50. Twenty-two low vehicle access census tracts were identified in San Antonio. One of these (48029110600) included Bexar County Adult Detention Facility and was dropped from further analysis. Twelve of the remaining 21 census tracts had 30% or more of their household units without access to a motor vehicle, including three that were above 40%. Two of the 21 tracts had African American CVAP majorities, while the remaining nineteen had Hispanic CVAP majorities. Ten of the nineteen majority Hispanic CVAP tracts had more than 30% of their household units lacking access to a motor vehicle, and three had rates of no access greater than 40%.

51. In the two low vehicle access tracts with majority African American CVAPs at least 36% of African American citizens had incomes below the poverty level. The rate of no

access to a motor vehicle in these tracts was higher for African American household units than it was for the tract as a whole. Among the majority Hispanic low vehicle access tracts, 15 tracts had a poverty rate of more than 30%, nine had rates above 40%, and five had rates above 50%.

52. The average driving time from the centroid of the 21 San Antonio low vehicle access tracts to the nearest DPS Office was calculated as 7.5 minutes. For those without access to a vehicle, the city of San Antonio is serviced by a well-developed and well-used bus system. See VIA, *Facts & Figures*, at <http://viainfo.net/Organization/Facts.aspx>. The average bus trip from a low vehicle access tract to a fixed DPS Office location was 36.2 minutes, excluding walking to and from bus stops. A table setting out travel times from each of the low vehicle access tracts in San Antonio to the nearest DPS Office is included in Appendix 1.

53. Temporary mobile units issuing EICs have been deployed in San Antonio in both 2013 and 2014. Here I analyze the deployments in 2014, including on February 25th at the Claude Black Community Center (2805 E, Commerce St.) and on February 26th at the Las Palmas Library (525 Castroville Rd.). Because of these single-day deployments registered voters traveling to the mobile unit on February 25th who discovered they were not in possession of all required documentation would not have the option of returning to the same location to secure an EIC on February 26th.

54. Driving and bus travel times were recalculated to include both DPS Offices and the mobile units present in San Antonio on February 25 and 26, 2014. The locations of the mobile units on the two days did result in reduced travel times for the residents of 13 of the 21 census tracts. The mean travel time for residents of all 21 census tracts with access to a motor vehicle fell from 7.5 minutes to 4.9 minutes, while bus travel time fell from 36.2 minutes to 31.3 minutes during the two day period. The fact that the mobile unit was available for only

one day in two different locations seriously calls in to question its benefit. Secondly, there remained a significant contrast between the travel time for those with access to a motor vehicle and those of necessity using the bus system. A table setting out travel times from each of the low vehicle access tracts in San Antonio to the nearest DPS Office or 2014 temporary location is included in Appendix 1.

55. Overall, low vehicle access tracts in San Antonio are largely populated by Hispanics and, to a lesser degree, by African Americans. These tracts are also generally characterized by high rates of poverty. Economically poor potential voters without access to a motor vehicle can use a city bus to travel to the nearest DPS Office, but the estimated trip travel times for these citizens are nearly five times longer than for citizens residing in the same census tract with access to a motor vehicle. While the two single-day deployments of a mobile unit did reduce one way travel times for both those with access to a motor vehicle and those of necessity using the bus system, the brevity of the deployment calls into question the demonstrable benefits of the mobile units. Secondly, even with the decreases in travel times there remained significant contrasts between the estimated times for those with access to a motor vehicle and those using the city bus service. Eligible voters using the bus system will spend 6.4 times more time one way to visit either a DPS Office or mobile unit than those with access to a motor vehicle in the same census tract.

Table 6: Travel Time to Locations to Obtain an EIC in San Antonio

One-Way Travel Time	All Tracts	Low Vehicle Access Tracts	Low Vehicle Access Tracts (including DPS Temporary Locations)
Minutes By Car	9.9	7.5	4.9
Minutes By Bus	n/a	36.2	31.3

Sources: Calculations were made using the ArcGIS Network Analyst extension and Viva.org.

Dallas

56. Dallas is located in Dallas County and is the third largest city in Texas with a 2010 population of 1,197,817 and a CVAP of 661,962. Anglos account for 45% of the citizen voting age population (CVAP) in Dallas, followed by African Americans (30.8%), and Hispanics (20.2%). Of the three cities examined, Dallas has by proportion the largest Anglo (45%) citizen voting age population and the smallest Hispanic (20.2%) citizen voting age population. The Anglo population is concentrated in the northern portion of Dallas, while the African American population is concentrated in the southern portion of the city. The Hispanic population has geographic concentrations on both the east and west sides.

57. The poverty rate within the city of Dallas was 20.7% according to 2006-2010 ACS estimates. This rate varied substantially by demographic group with only 7.7% of Anglo U.S. citizens but 27.6% of Hispanic U.S. citizens and 30.2% of African American U.S. citizens having incomes below the poverty level. Geographically the most significant pockets of poverty in Dallas are located in the southern and south central portions of the city, most particularly in areas with high proportions of African Americans.

58. Household unit access to motor vehicles in Dallas also varies by demographic group. While 9.9% of household units in Dallas did not have access to a motor vehicle, the rate for Anglo household units was nearly half the citywide rate at 5.3%. In comparison, 6.9% of Hispanic household units and 20.7% of African American household units did not have access to a motor vehicle. Geographically those household units lacking access to a motor vehicle tend to be located in the central and southern portions of the city, though there are several tracts in the northeast part of Dallas with proportions above the citywide proportion as well. These tracts generally have substantial African American or Hispanic populations.

Table 7: CVAP, Poverty, and Vehicle Access in Dallas by Race

	CVAP, Percent	Citizen Poverty, Percent	Households without Vehicle Access, Percent
Anglo	45.0%	7.7%	5.3%
Hispanic	20.2%	30.2%	6.9%
African American	30.8%	27.6%	20.7%

Source: American Community Survey Five-Year Estimates 2006-2010, Tables, B05001, B17001, B17025 & B25044

59. The geographic distribution of DPS Offices or mobile offices providing EICs is one factor determining whether different groups are affected differently when trying to secure appropriate identification to vote. There are two DPS Offices in the city of Dallas and six more relatively near the municipal boundary and within Dallas County. Additionally, one mobile unit providing EICs visited Dallas in 2014, on Tuesday February 18, which is considered separately below. The distance to a DPS Office was calculated for all U.S. citizens of voting age for all 302 census tracts with centroids within the municipal boundary of the city of Dallas. The average distance from all tract centroids to a DPS office in Dallas is 7.1 miles and the estimated travel time by car is 11.3 minutes.

Figure 19: City of Dallas, Anglo Population

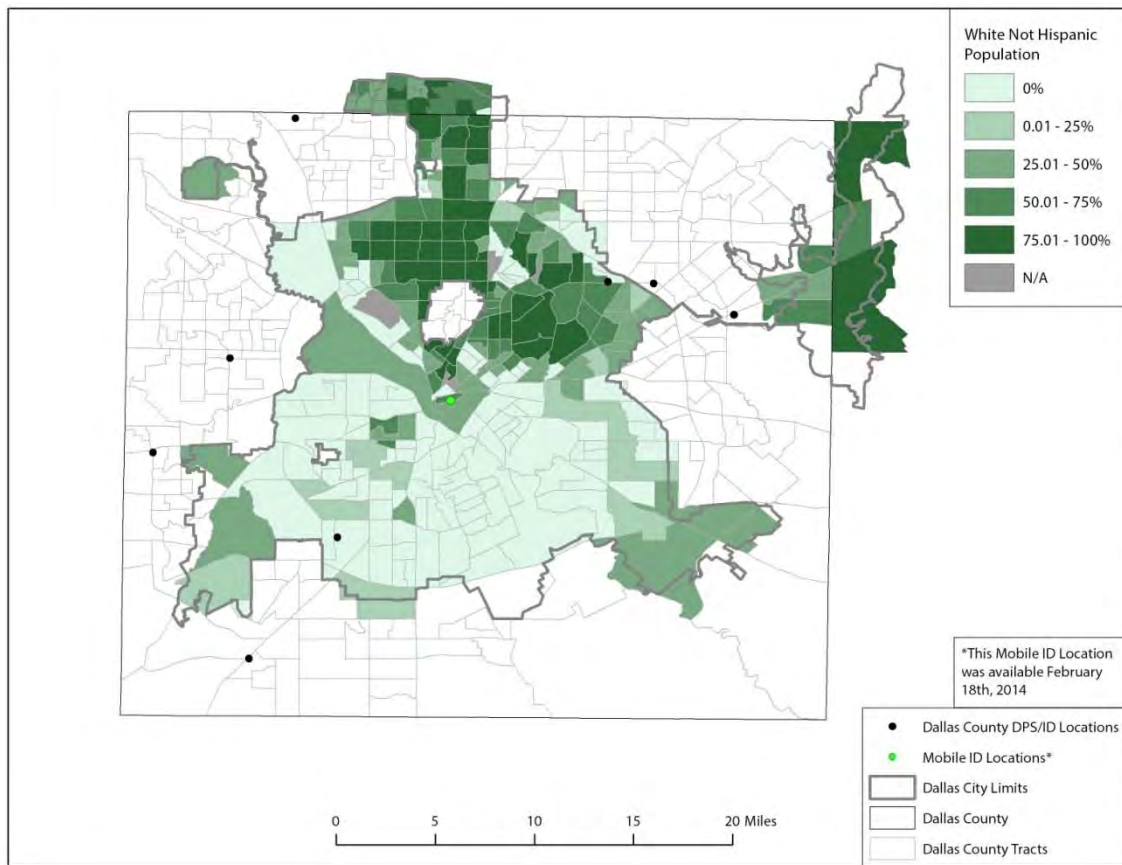


Figure 20: City of Dallas, Black Non-Hispanic Population

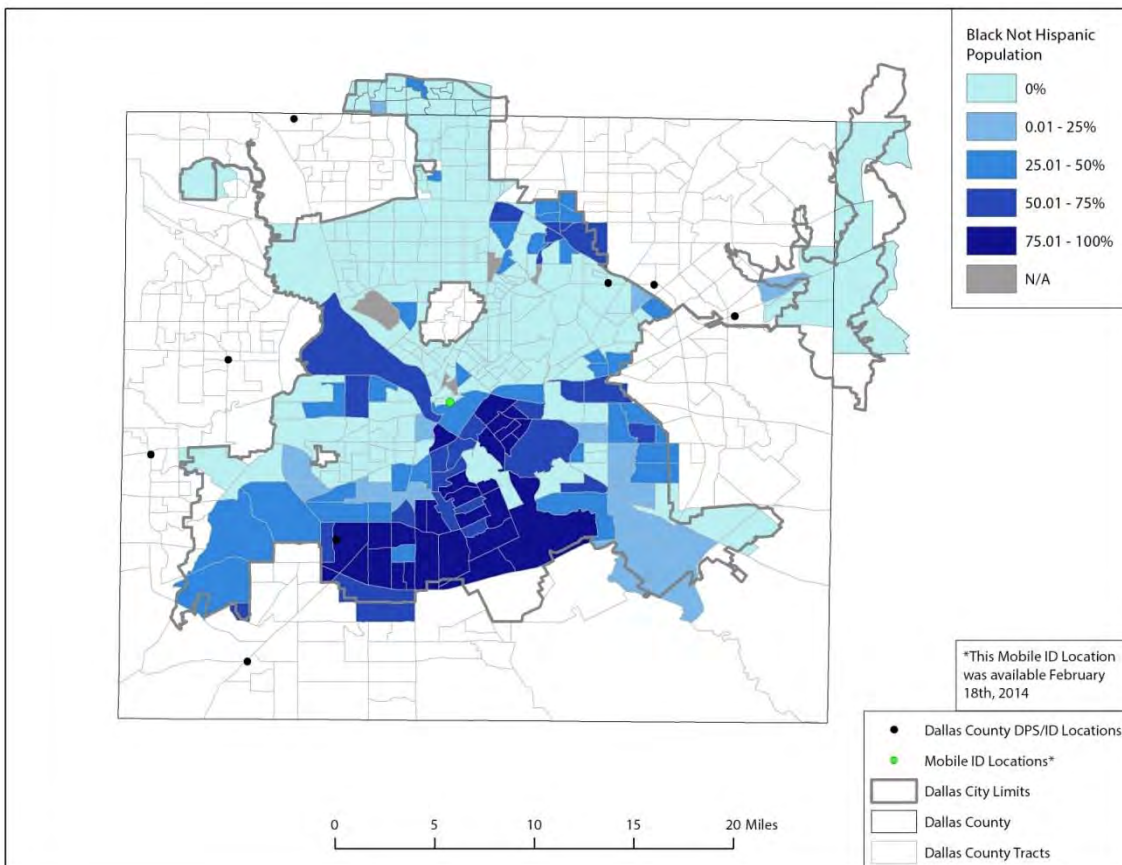


Figure 21: City of Dallas, Hispanic Population

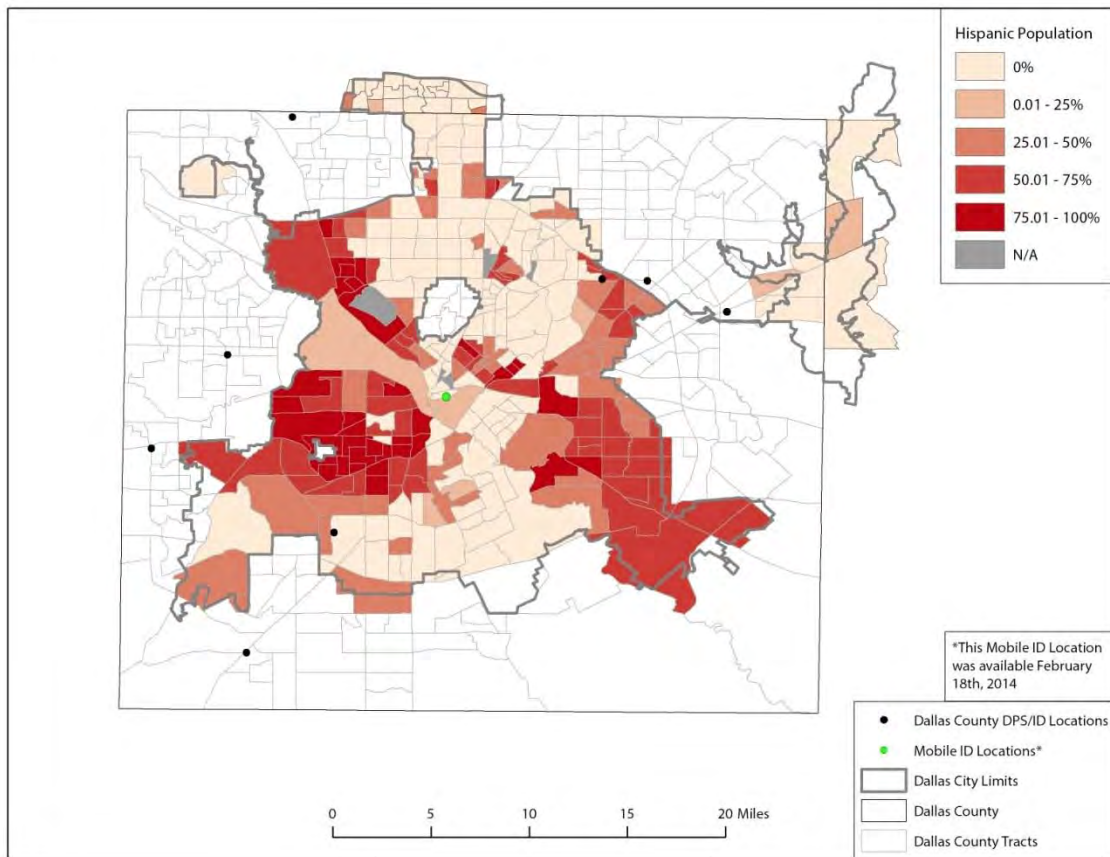


Figure 22: City of Dallas, Poverty Rate

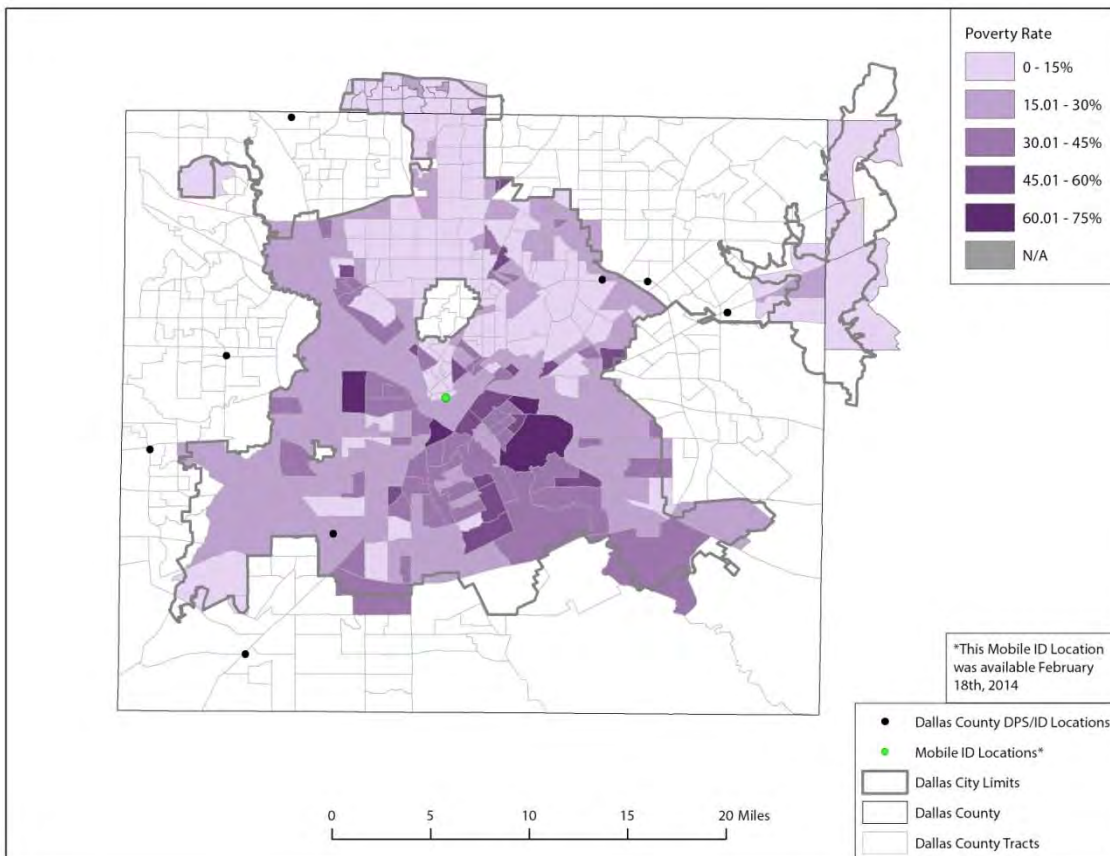


Figure 23: City of Dallas, Occupied Housing Units Without Vehicle Access

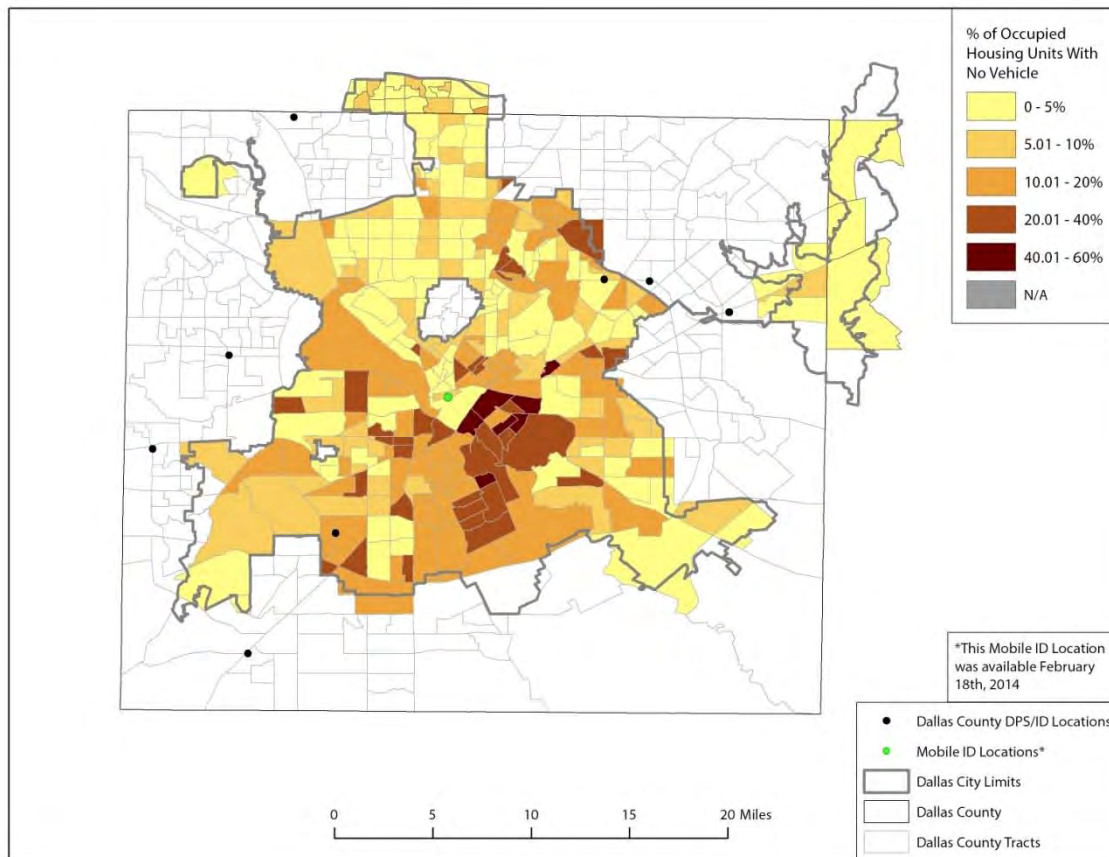
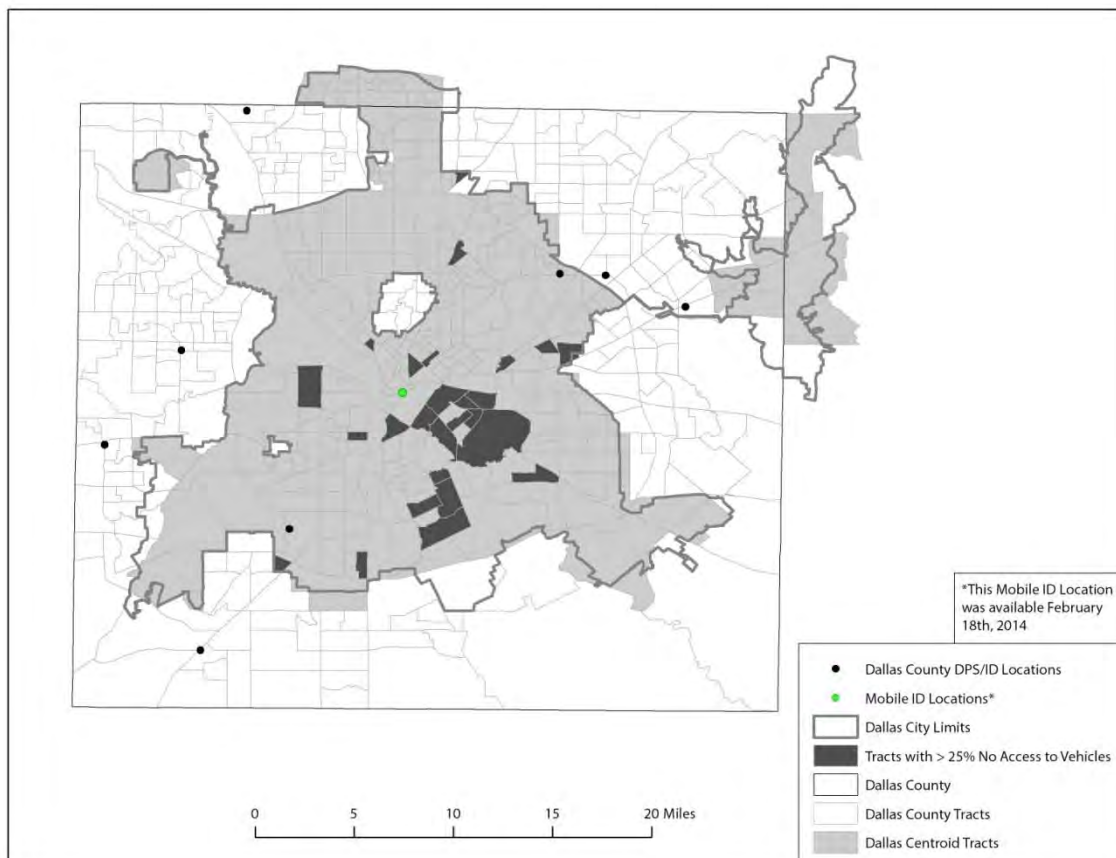


Figure 24: City of Dallas, Low Vehicle Access Tracts



60. Nearly ten percent of household units in Dallas do not have access to a motor vehicle making the above distance and time calculations to a DPS Office largely irrelevant to potential voters living in these household units. This analysis identified 26 census tracts in Dallas in which more than twenty-five percent of the household units had no access to a motor vehicle. Included in these 26 low vehicle access tracts were 21 that were majority or plurality African American CVAP, four that were majority or plurality Hispanic CVAP, and one had a majority Anglo CVAP.

61. African American household units were more likely than all household units to lack access to a motor vehicle in the majority or plurality African American CVAP tracts. These tracts also exhibit high poverty rates with fifteen of these tracts having more than 40% of African American citizens living below the poverty level. Among Hispanic CVAP majority or plurality low vehicle access tracts more than 40% of Hispanic citizens had incomes below the poverty level. In the sole majority-Anglo CVAP low vehicle access tract nearly a third of Anglo citizens lived below the poverty level.

62. The average estimated driving time with a motor vehicle from the centroid of the 25 low vehicle access tracts in Dallas to the nearest DPS Office was calculated as 12.8 minutes. For those without access to a motor vehicle, the city of Dallas is served by a well-developed and well-used bus system. See DART, *Facts About Dallas Area Rapid Transit*, <http://www.dart.org>. The average bus trip travel time (excluding walking) from a low vehicle access tract in Dallas to a DPS Office was 59.7 minutes. A table setting out travel times from each of the low vehicle access tracts to the nearest DPS Office is included in Appendix 1.

63. Temporary mobile units issuing EICs were deployed in Dallas in both 2013 and 2014. In 2014, Dallas had a single mobile unit deployed for a single day at the J. Erik Jonsson

Central Library (1515 Young St.). This schedule limits the degree to which this temporary location reduces barriers to obtain an EIC.

64. Driving and bus travel times were recalculated for all DPS Offices and the single mobile unit available on February 18th. The location of the single mobile unit did result in reduced travel times for the residents of 19 of the 26 census tracts. For example, the mean travel time for residents of all 26 census tracts with access to a motor vehicle fell from 12.8 minutes to 7.8 minutes, while mean bus travel time fell from 59.7 minutes to 33.5 minutes. Thus, the placement of the mobile units did have a positive effect. But the fact that the mobile unit was only available for a single day calls in to question its benefits. Secondly, there remained a significant contrast between the travel time for those with access to a motor vehicle and those of necessity using the bus system in the same census tract, with bus passengers spending 4.1 times more travel time each way to the nearest DPS Office or mobile unit. A table setting out travel times from each of the low vehicle access tracts to the nearest DPS Office or mobile unit location is also included in Appendix 1.

65. This analysis finds that Dallas census tracts with large proportions of household units without access to a motor vehicle are overwhelmingly populated by African Americans, and to a lesser degree Hispanics. There is a single tract with majority Anglo CVAP. These 26 tracts are also characterized by high rates of poverty. Economically poor potential voters without access to a motor vehicle can use a city bus to travel to the nearest DPS office, but the estimated trip travel time for these citizens to arrive at the DPS Office is nearly five times longer than for someone driving a motor vehicle. The mobile unit deployed to Dallas on February 18, 2014 did reduce average travel times for both motor vehicle and bus travel times on that day. But since the mobile unit was deployed for only a single day its value in

facilitating increased access to EICs is questionable. Finally, even considering the reduced travel times on February 18th, bus passengers would still have spent over four times more one-way travel time than motor vehicle travelers in the same census tract to arrive at either a DPS Office or the mobile unit.

Table 8: Travel Time to Locations to Obtain an EIC in Dallas

One-Way Travel Time	All Tracts	Low Vehicle Access Tracts	Low Vehicle Access Tracts (including DPS Temporary Locations)
Minutes By Car	11.3	12.8	7.8
Minutes By Bus	n/a	59.7	33.5

Sources: Calculations were made using the ArcGIS Network Analyst extension and Dart.org.

NO MATCH LIST

66. This final section pertains to data in the “no match list” developed by Professor Stephen Ansolabehere. The data set used here includes all Texas registered voters for whom there are census tract locations in the state of Texas, and the no match list consists of voters who do not possess any of the required forms of identification to cast an in-person vote on election day and who have not successfully applied for a disability-based exemption from the identification requirements. Deceased voters identified through DPS records have been purged from the data set. The “no match list” consists of those registered voters who could arrive at the polls and find they are unable to cast a regular valid ballot.

Figure 25: State of Texas, Lack of SB 14 ID

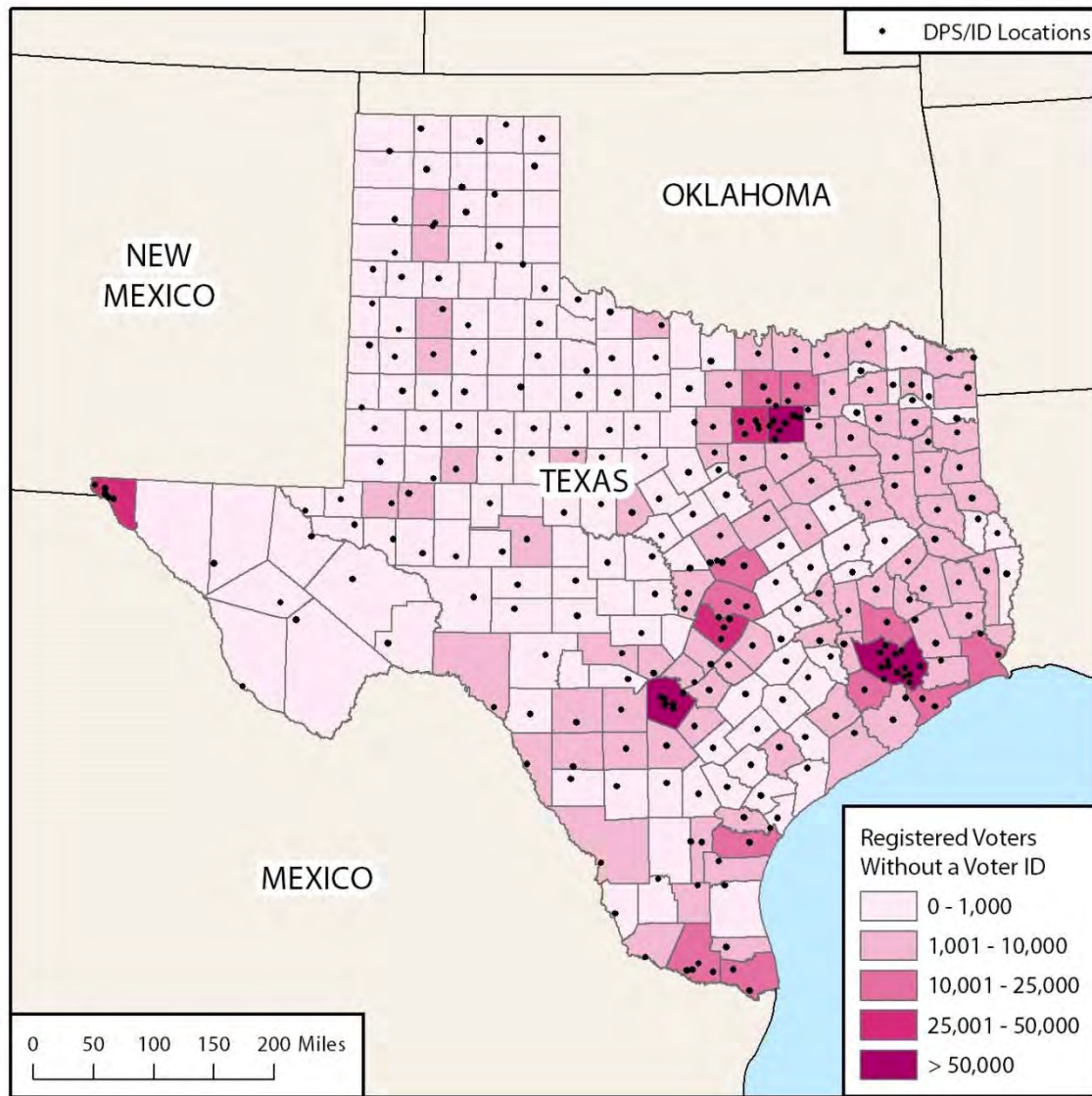


Figure 26: State of Texas, Lack of SB 14 ID Rate

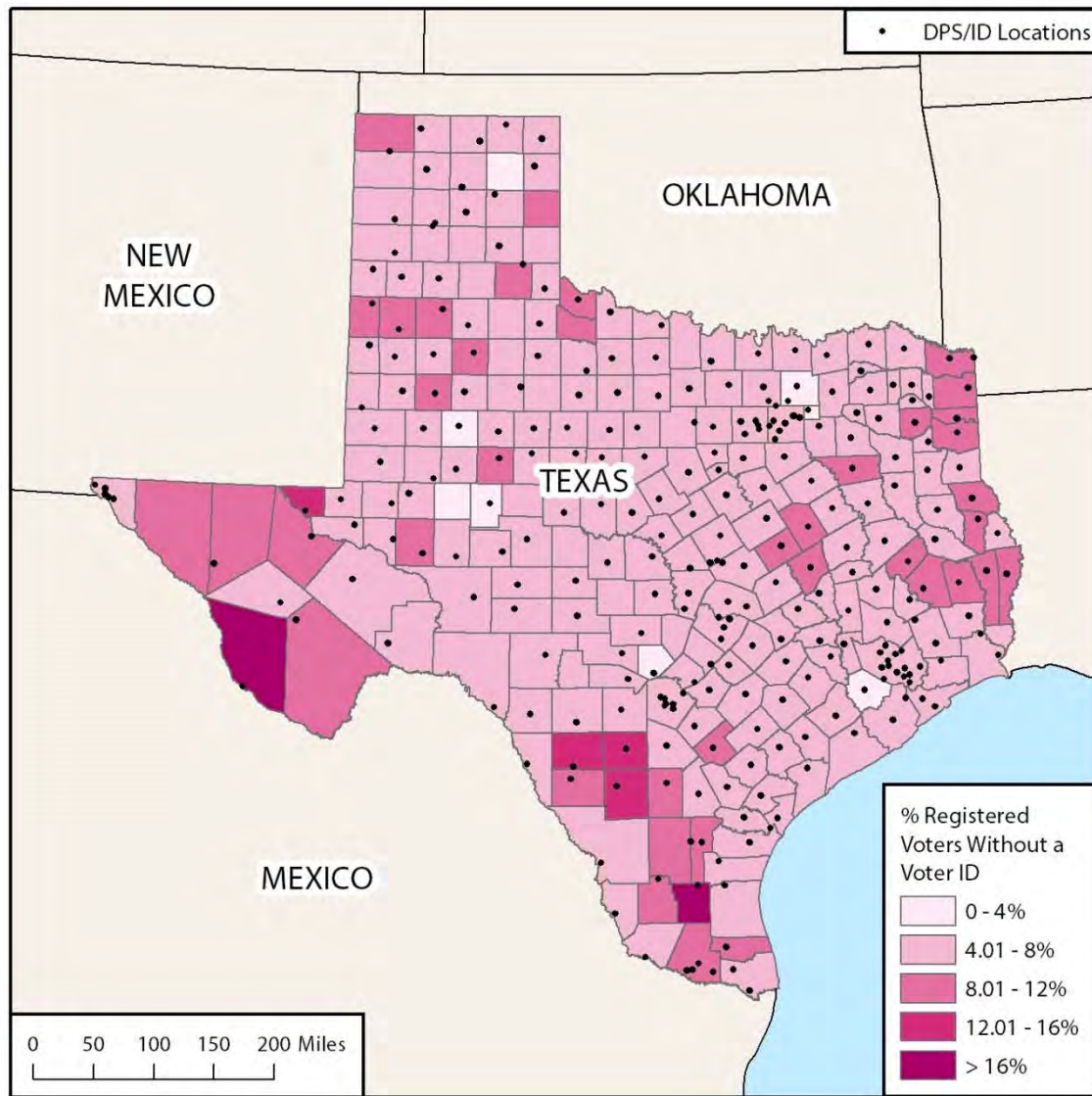


Figure 27: City of Houston, Lack of SB 14 ID Rate

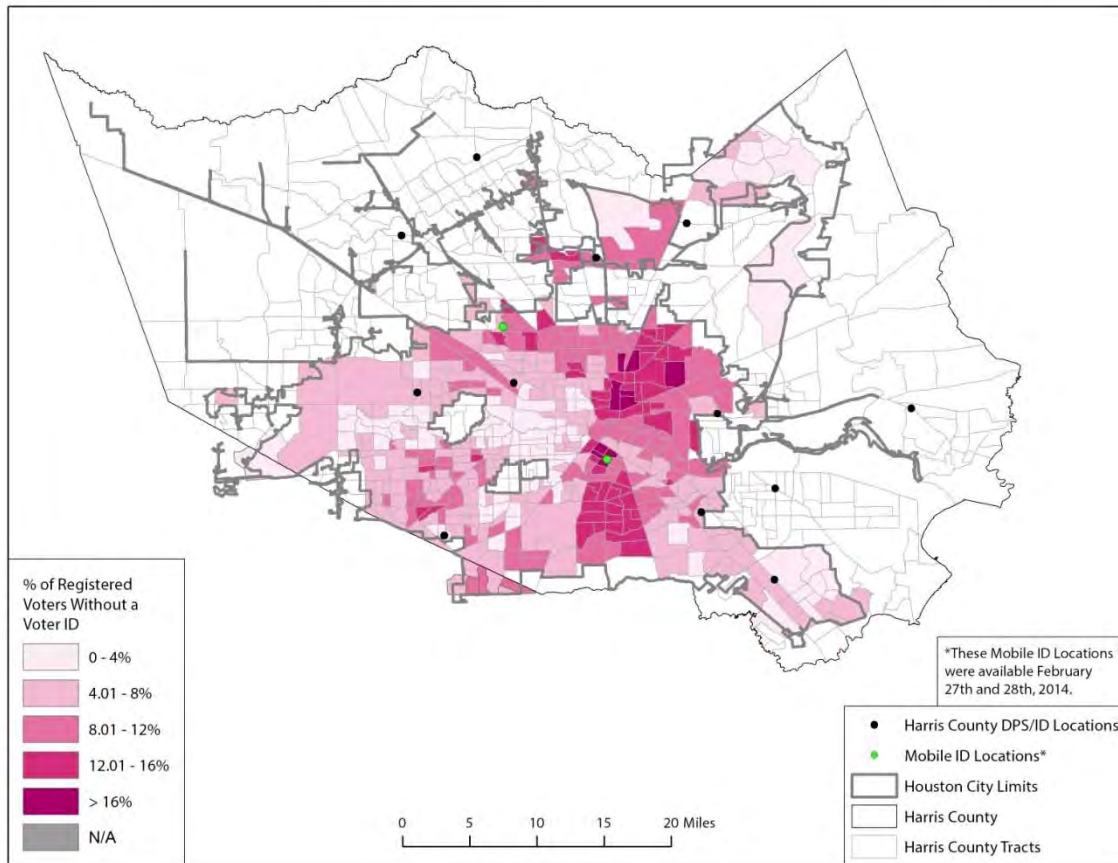


Figure 28: City of Sam Antonio, Lack of SB 14 ID Rate

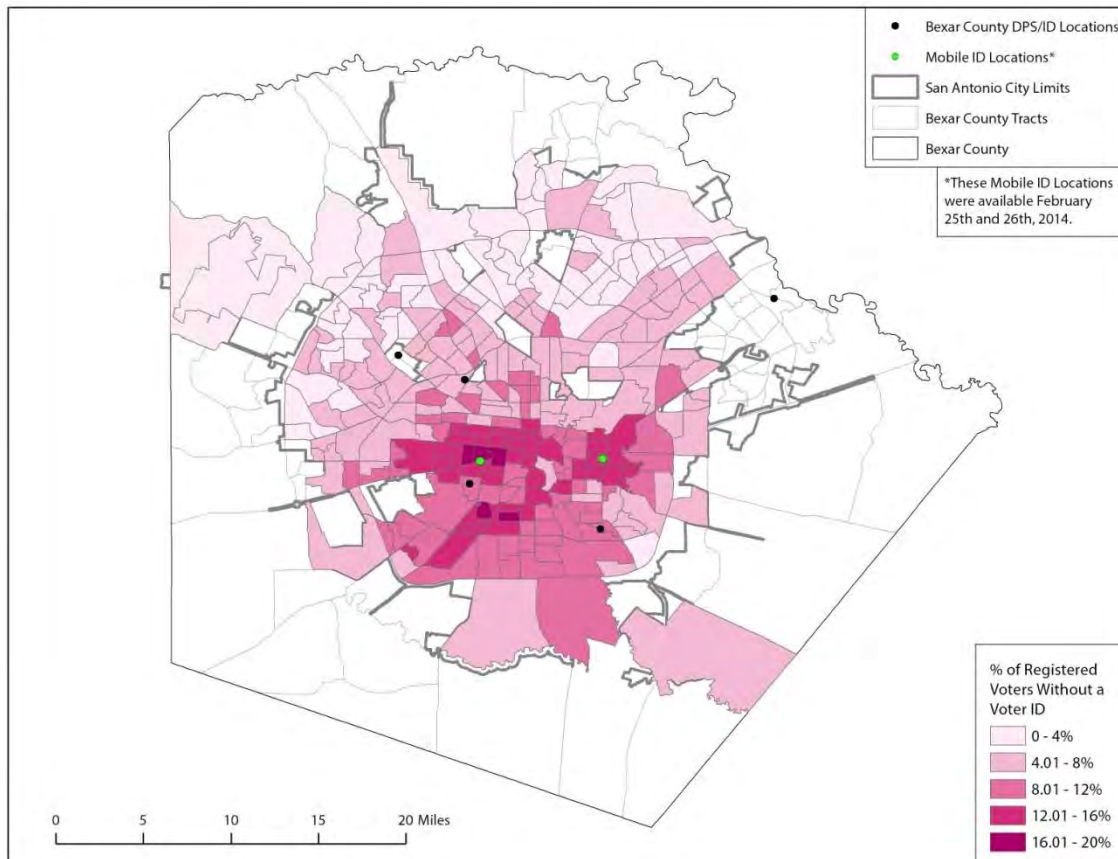
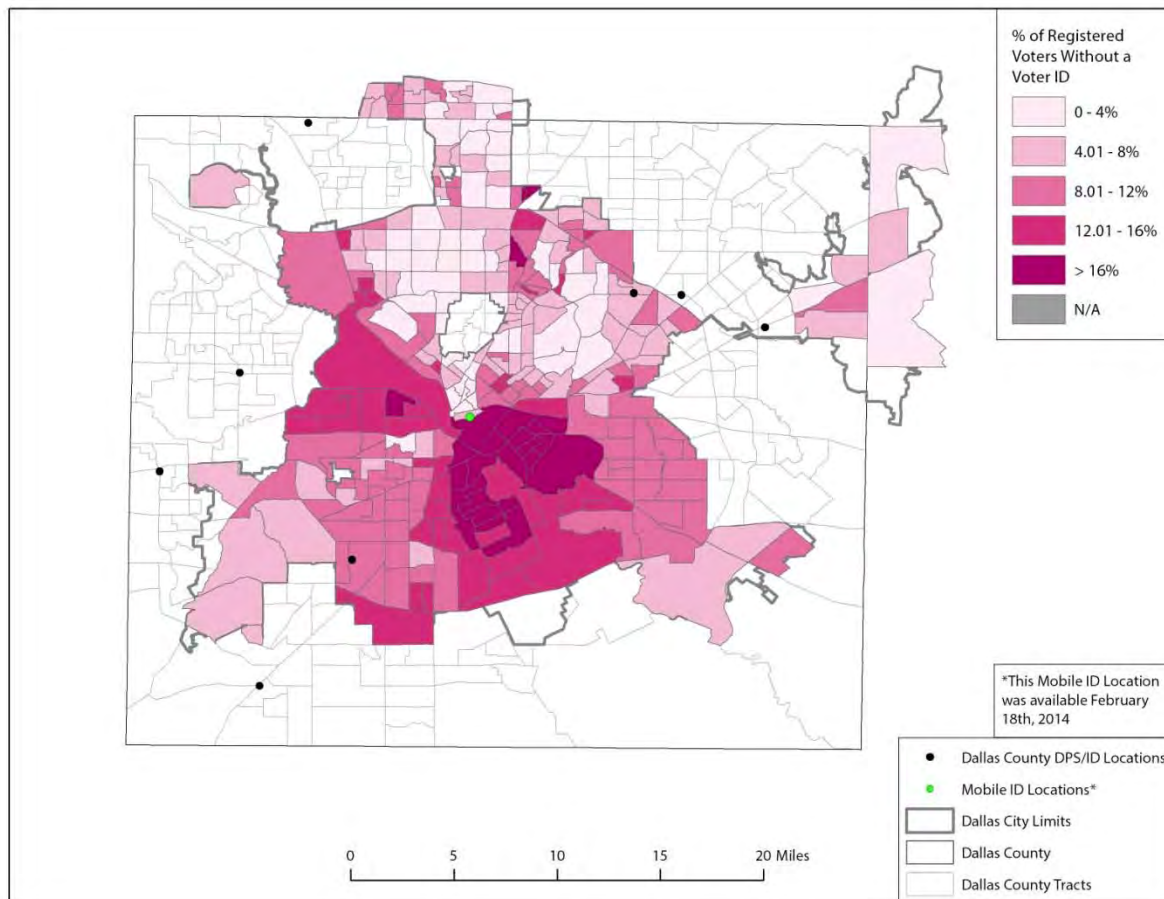


Figure 29: City of Dallas, Lack of SB 14 ID Rate



67. In total there are 784,396 registered voters in Texas without a form of identification required by SB 14 to cast a regular in-person ballot. This figure is 5.8% of all registered voters in Texas. The problem is much greater in those 138 Texas census tracts in which more than a quarter of the household units do not have access to a motor vehicle. In these tracts, 26,262 or 13.2% of all registered voters do not possess the required identification to cast a regular vote. A review of Figure 26 indicates that there are three primary concentrations of counties in Texas with comparatively high proportions of registered voters without the identification required by SB 14: counties in the far eastern portion of the state with many having comparatively high concentrations of African Americans (see Figure 2); a cluster of counties in

South Texas which have high concentrations of Hispanics (see Figure 3); and the cluster of counties in far western Texas which have comparatively high proportions of Hispanics (see Figure 3).

68. When considering all census tracts with their centroids in the city limits of Houston, there are 66,952 registered voters without the identification required by SB 14. This figure constitutes 6.9% of all registered voters in Houston. The situation is far worse in the 30 census tracts in which more than a quarter of the household units do not have access to a motor vehicle. See Tables 4A, 4B and 4C, Appendix 1. In these tracts there are 6,434 registered voters without the required identification, or 13.5% of all registered voters in these 30 tracts. It should be reiterated that in 29 of these 30 census tracts African American or Hispanic citizens of voting age constitute a plurality or majority of the citizen voting age population.

69. When considering all census tracts with their centroids in the city limits of San Antonio, there are 46,084 registered voters without the identification required by SB 14. This figure constitutes 6.8% of all registered voters. The situation is far worse in the 21 census tracts in San Antonio in which more than a quarter of the household units are without access to a motor vehicle. See Tables 6A and 6B, Appendix 1. In these tracts there are 3,642 registered voters without the needed identification. This number is 12.2% of all registered voters in these 21 census tracts. African Americans and Hispanics constitute a majority or plurality of the citizen voting age population in all 21 of these census tracts.

70. When considering all census tracts with their centroids in the city limits of Dallas, there are 49,387 registered voters without the identification required by SB 14. This figure constitutes 8.2% of all registered voters. The situation is far worse in the 26 low vehicle access census tracts in Dallas. See Tables 8A, 8B and 8C, Appendix 1. In these tracts there are 5,965

registered voters without the forms of identification required by SB 14. This figure is 15.1% of all registered voters in these tracts. African Americans or Hispanics constitute a majority or plurality of the citizen voting age populations in 25 of these 26 census tracts.

**Table 9: Registered Voters in Texas and Selected Cities
Without Needed Identification Under SB 14**

Location	Total Registered Voters	Total Registered Voters without SB 14 ID	Percent Registered Voters without SB 14 ID
State of Texas	13,462,610	784,396	5.8%
Low Vehicle Access Tracts in Texas*	198,397	26,262	13.2%
City of Houston*	966,820	66,952	6.9%
Low Vehicle Access Tracts in Houston**	47,780	6,434	13.5%
City of San Antonio*	682,056	46,084	6.8%
Low Vehicle Access Tracts in San Antonio**	29,860	3,642	12.2%
City of Dallas*	601,232	49,387	8.2%
Low Vehicle Access Tracts in Dallas**	39,594	5,965	15.1%

SOURCE: Data in the no match list were provided by the U.S. Department of Justice.

*Analysis includes all census tracts with their centroids located within the municipal boundary of the respective city.

**Low vehicle access tracts are defined as those in which more than 25% of the household units do not have access to a motor vehicle. There are 139 such tracts in the State of Texas, 30 in Houston, 21 in San Antonio and 26 in Dallas. See Tables 4A, 4B & 4C, Tables 6A & 6B and Tables 8A, 8B and 8C for the tract numbers in the three cities.

71. Pearson's correlation analysis was used to determine if there were statistical associations between the percent of registered voters on the no match list without the forms of identification required by SB 14 and percent Anglo CVAP, percent African American CVAP,

percent Hispanic CVAP and selected socioeconomic variables at the census tract level. For the state as a whole there were substantial and statistically significant positive associations between the percentage of registered voters on the no match list and percent African American CVAP, percent Hispanic CVAP, the poverty rate, and the percentage of household units without access to a motor vehicle. There was a substantial and statistically significant negative association between percent Anglo CVAP and the percentage of registered voters on the no match list. These correlations strongly suggest that higher percentages of registered voters without the required identification by SB 14 are found in census tracts with higher percentages of African American and Hispanic citizens of voting age, higher rates of poverty, more limited access to motor vehicles, and lesser percentages of Anglo citizens of voting age.

72. Associations similar to those described above were found in Houston, San Antonio, and Dallas. In all three cities higher proportions of registered voters on the no match list were associated with higher proportions of African American and Hispanic citizens of voting age, higher rates of poverty, and more limited access to motor vehicles by household units. In all three cities the proportion of Anglo citizens of voting age was substantially associated with lesser percentages of registered voters on the no match list.

Table 10: Pearson's Correlation Coefficients
with Percent of Registered Voters on the No Match List

	Texas (N=5,234)	Houston (N=458)	San Antonio (N=285)	Dallas (N=302)
Anglo CVAP Percent	-0.563**	-0.723**	-0.775**	-0.785**
African American CVAP Percent	0.409**	0.664**	0.212**	0.650**
Hispanic CVAP Percent	0.323**	0.177**	0.717**	0.257**
Poverty Rate	0.600**	0.756**	0.699**	0.790**
No Access to a Motor Vehicle Percent	0.576**	0.717**	0.688**	0.699**

** Correlation is significant at the 0.01 level (2-tailed).

CONCLUSIONS

73. The time required to travel to and from a DPS Office can pose significant obstacles and include significant costs to a voter attempting to obtain an EIC, with the burden falling most heavily on potential voters who lack access to a motor vehicle. The cities of Houston, San Antonio, and Dallas contain more than half of the census tracts in Texas in which more than 25% of households do not have access to a motor vehicle. In all three cities these low vehicle access census tracts are overwhelmingly populated by African Americans and Hispanics and exhibit high rates of poverty. Although all three cities have well developed and well utilized bus systems, their use increases trip travel time several fold over the use of a motor vehicle. While temporary DPS offices can reduce travel times, their highly limited deployment minimizes if not negates any ameliorative effect on those attempting to secure an EIC.

74. The analysis of the no match list indicates that census tracts with greater percentages of Hispanic and African American citizens of voting age tend to have higher percentages of registered voters without the forms of identification required by SB 14. The correlations were particularly strong between percent African American CVAP and the percent of voters on the no match list in Houston and Dallas, and percent Hispanic CVAP and the percent of voters on the no match list in San Antonio. This analysis further determined that census tracts with higher rates of poverty and more limited access to motor vehicles also tend to have higher percentages of registered voters without the forms of identification required by SB 14.

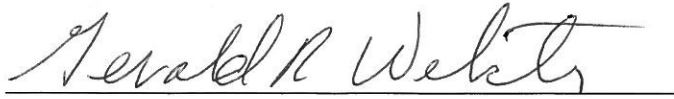
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- Ullman, Edward. 1954. "Geography as Spatial Interaction," *Interregional Linkages, the Proceedings of the Western Committee on Regional Economic Analysis*. pp. 63-71. Berkeley, CA.
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Appendices

- 1) Tables
- 2) Supplemental Maps
- 3) Declarations
- 4) Vita

I declare under penalty of perjury the foregoing is true and correct. Executed this 15th day of August, 2014.

A handwritten signature in cursive script, reading "Gerald R. Webster", is written over a horizontal line.

Gerald R. Webster

Appendix 1

Table 4A: Selected Characteristics of Houston Census Tracts Having 25% of More of Household Units Without Access to a Motor Vehicle: Tracts with a Majority of Plurality of African American Citizens of Voting Age

Tract	Households without Vehicle Access	African American CVAP	African American Citizen Poverty	African American Households without Vehicle Access	One-Way Time to DPS by Car*	One-Way Time to DPS by Bus**	No-Match Registered Voters	No-Match Rate
48201312200	56.7%	92.9%	68.2%	56.3%	12 minutes	68 minutes	208	17.2%
48201331400	54.9%	97.4%	53.8%	56.4%	15 minutes	112 minutes	158	13.1%
48201312800	51.4%	94.5%	69.5%	48.5%	13 minutes	52 minutes	368	21.8%
48201312300	44.9%	86.6%	31.1%	48.1%	13 minutes	84 minutes	186	16.0%
48201532001	41.0%	73.5%	65.8%	49.6%	9 minutes	24 minutes	235	12.2%
48201211300	35.4%	89.9%	60.3%	38.3%	9 minutes	22 minutes	407	14.8%
48201312400	34.6%	90.2%	42.9%	43.1%	12 minutes	82 minutes	212	17.0%
48201211000	34.5%	88.5%	42.4%	38.1%	12 minutes	25 minutes	197	17.0%
48201211400	33.7%	70.9%	39.7%	46.5%	9 minutes	35 minutes	238	11.4%
48201531800	31.5%	90.6%	26.5%	32.3%	9 minutes	80 minutes	220	12.7%
48201220800	31.2%	73.4%	52.7%	43.0%	12 minutes	76 minutes	207	16.7%

48201550200	30.6%	80.3%	45.0%	39.3%	13 minutes	54 minutes	143	12.3%
48201422401	30.2%	58.7%	36.7%	17.2%	5 minutes	79 minutes	114	7.4%
48201313600	29.5%	94.5%	36.6%	33.1%	13 minutes	116 minutes	420	14.5%
48201222600	28.8%	46.2%	59.3%	60.0%	8 minutes	51 minutes	89	11.9%
48201433502	27.9%	49.5%	43.8%	32.5%	8 minutes	42 minutes	125	10.3%
48201313800	27.6%	95.6%	47.2%	29.3%	13 minutes	106 minutes	349	14.1%
48201222700	27.4%	69.2%	58.9%	35.7%	5 minutes	4 minutes	255	11.7%
48201331200	26.5%	94.2%	26.1%	28.7%	14 minutes	117 minutes	309	12.8%
48201211700	26.2%	87.7%	37.4%	26.9%	10 minutes	50 minutes	329	14.2%
48201240502	26.2%	65.0%	37.8%	23.7%	8 minutes	8 minutes	158	12.0%
48201233600	25.8%	99.2%	33.5%	25.0%	7 minutes	56 minutes	213	14.7%
48201211100	25.3%	81.0%	45.1%	28.9%	11 minutes	55 minutes	448	16.2%

Table 4B: Selected Characteristics of Houston Census Tracts Having 25% of More of Household Units Without Access to a Motor Vehicle: Tracts with a Majority of Plurality of Hispanic Citizens of Voting Age

Tract	Households without Vehicle Access	Hispanic CVAP	Hispanic Citizen Poverty	Hispanic Households without Vehicle Access	One-Way Time to DPS by Car*	One-Way Time to DPS by Bus**	No-Match Registered Voters	No-Match Rate
48201220500	40.8%	50.7%	31.4%	21.8%	10 minutes	87 minutes	162	9.9%
48201432701	34.8%	27.7%	67.9%	39.3%	12 minutes	84 minutes	99	14.1%
48201433003	31.6%	22.7%	50.1%	31.3%	10 minutes	93 minutes	67	6.7%
48201421202	31.4%	66.3%	66.9%	35.1%	12 minutes	105 minutes	31	11.9%
48201212300	28.2%	87.4%	43.8%	23.7%	12 minutes	61 minutes	289	13.3%
48201420500	25.4%	21.4%	42.7%	14.6%	7 minutes	59 minutes	80	9.0%

Table 4C: Selected Characteristics of Houston Census Tracts Having 25% of More of Household Units Without Access to a Motor Vehicle: Tracts with a Majority of Plurality of Anglo Citizens of Voting Age

Tract	Households without Vehicle Access	Anglo CVAP	Anglo Citizen Poverty	Anglo Households without Vehicle Access	One-Way Time to DPS by Car*	One-Way Time to DPS by Bus**	No-Match Registered Voters	No-Match Rate
48201432802+	32.6%	37.2%	13.4%	45.7%	11 minutes	114 minutes	118	9.7%

*Times for car travel time were calculated with ArcGIS's Network Analysts extension using the census tract's centroid as the starting point.

**Times for bus travel were calculated with RidMetro.org using the census tract's centroid as the starting point. For consistency, all trips were assumed to begin at 8:00am on a weekday. Times for bus travel do not include a calculation for walking to the nearest bus stop to begin the trip, and from the last bus stop to the DPS Office.

+This tract includes Bellerive, a public senior housing facility that includes 200 one bedroom and 10 two bedroom units.

Table 6A⁺: Selected Characteristics of San Antonio Census Tracts Having 25% of More of Household Units Without Access to a Motor Vehicle: Tracts with a Majority of Plurality of African American Citizens of Voting Age

Tract	Households without Vehicle Access	African American CVAP	African American Citizen Poverty	African American Households without Vehicle Access	One-Way Time to DPS by Car*	One-Way Time to DPS by Bus**	No-Match Registered Voters	No-Match Rate
48029130600	32.0%	54.6%	48.1%	35.5%	10 minutes	34 minutes	250	15.9%
48029130500	31.4%	52.0%	36.9%	42.0%	9 minutes	39 minutes	257	14.5%

Table 6B⁺: Selected Characteristics of San Antonio Census Tracts Having 25% of More of Household Units Without Access to a Motor Vehicle: Tracts with a Majority of Plurality of Hispanic Citizens of Voting Age

Tract	Households without Vehicle Access	Hispanic CVAP	Hispanic Citizen Poverty	Hispanic Households without Vehicle Access	One-Way Time to DPS by Car*	One-Way Time to DPS by Bus**	No-Match Registered Voters	No-Match Rate
48029110500	46.9%	92.9%	55.8%	45.3%	9 minutes	26 minutes	85	13.6%
48029110100	42.4%	55.5%	29.1%	43.7%	9 minutes	29 minutes	193	12.2%
48029181005	40.9%	55.3%	43.8%	33.2%	3 minutes	19 minutes	95	8.5%
48029170401	36.7%	91.0%	52.4%	37.2%	8 minutes	29 minutes	203	12.5%

48029110800	36.3%	66.5%	37.9%	33.6%	10 minutes	46 minutes	77	9.2%
48029110700	35.0%	84.2%	42.0%	30.0%	9 minutes	36 minutes	76	12.5%
48029170800	32.3%	96.8%	33.4%	32.9%	5 minutes	10 minutes	98	14.1%
48029111000	31.6%	77.3%	39.0%	33.2%	11 minutes	29 minutes	110	9.6%
48029192200	30.2%	79.3%	14.3%	40.0%	6 minutes	86 minutes	129	9.5%
48029150800	30.0%	85.2%	71.9%	31.7%	5 minutes	68 minutes	103	12.0%
48029190100	28.8%	78.8%	22.8%	28.4%	8 minutes	38 minutes	236	13.1%
48029170300	28.5%	93.5%	45.4%	28.7%	5 minutes	26 minutes	410	16.2%
48029130402	28.4%	51.8%	60.3%	20.8%	9 minutes	37 minutes	201	12.8%
48029130700	27.6%	77.8%	37.8%	18.3%	11 minutes	38 minutes	97	14.8%
48029170200	27.4%	95.9%	54.8%	27.9%	8 minutes	29 minutes	436	15.0%
48029180501	27.3%	72.8%	43.4%	28.0%	5 minutes	40 minutes	191	8.6%
48029190504	27.1%	80.0%	22.8%	28.1%	7 minutes	38 minutes	144	10.2%
48029110300	27.0%	69.3%	33.8%	24.7%	7 minutes	35 minutes	117	9.8%
48029180400	25.6%	81.8%	33.5%	23.2%	3 minutes	28 minutes	134	7.5%