

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

STATE OF TEXAS
c/o Attorney General Greg Abbott
209 West 14th Street Austin, Texas 78701

Plaintiff,

vs.

ERIC H. HOLDER, JR.,
ATTORNEY GENERAL OF THE
UNITED STATES
950 Pennsylvania Ave., N.W.
Washington, DC 20530

Defendant.

EXPEDITED COMPLAINT FOR DECLARATORY JUDGMENT

1. The State of Texas brings this suit under section 5 of the Voting Rights Act of 1965, 42 U.S.C. § 1973c ("section 5"), and under 28 U.S.C. § 1331, and seeks a declaratory judgment that its recently enacted Voter-ID Law, also known as Senate Bill 14, neither has the purpose nor will have the effect of denying or abridging the right to vote on account of race or color, nor will it deny or abridge the right of any citizen of the United States to vote because he is a member of a language minority group.

I. THE PARTIES

2. The plaintiff is the State of Texas.

3. The defendant, United States Attorney General Eric Holder acting in his official capacity, has his office in the District of Columbia.

II. JURISDICTION AND VENUE

4. The Court has jurisdiction under 28 U.S.C. § 1331 and venue under 42 U.S.C. § 1973c.

III. THREE-JUDGE COURT

5. The State of Texas requests the appointment of a three-judge court under 42 U.S.C. § 1973b and 28 U.S.C. § 2284.

IV. FACTS AND BACKGROUND

6. On May 27, 2011, the Governor of Texas signed into law Senate Bill 14, which requires most voters to present a government-issued photo identification when appearing to vote at the polls. Voters who suffer from a documented disability as determined by the United States Social Security Administration or the Department of Veteran Affairs are exempt from this requirement. *See* SB 14 § 1. (Ex. 1). The Texas Election Code also permits voters over the age of 65, as well as disabled voters, to vote by mail, and those who vote by mail are not required to obtain or present photo identification when voting. *See* TEX. ELECTION CODE §§ 82.002–82.003.

7. Voters who lack a government-issued photo identification may obtain from the Texas Department of Public Safety (DPS) an “election identification certificate,” which is issued free of charge and satisfies the photo-identification requirements of Senate Bill 14. *See* SB 14 § 20.

8. Under Senate Bill 14, voters who fail to bring a government-issued photo identification may still cast a provisional ballot at the polls. Those ballots will be accepted if the voter presents a government-issued photo identification to the voter registrar within six days after the election, or if the voter executes an affidavit stating that the voter has a religious objection to being photographed or that he has lost his photo identification in a natural disaster that occurred within 45 days of the election. See SB 14 §§ 17-18.

9. Senate Bill 14 resembles the Indiana Voter-ID Law that the Supreme Court of the United States upheld as constitutional in *Crawford v. Marion County Election Bd.*, 553 U.S. 181 (2008). Indiana's law was allowed to go into effect upon enactment, because Indiana is not a "covered jurisdiction" under the Voting Rights Act. Other States, such as Wisconsin and Kansas, have enacted photo-identification requirements in 2011 and are permitted to immediately enforce their laws regardless of whether DOJ may object to those laws.

10. Senate Bill 14 also resembles the Voter-ID Law in Georgia that the Department of Justice precleared in 2005.

11. Section 5 prohibits a State subject to section 4(b) of the Voting Rights Act, 42 U.S.C. § 1973b(b), from enforcing "any voting qualification or prerequisite to voting . . . different from that in force and effect on November 1, 1964" unless the State either obtains a declaratory judgment from the

United States District Court for the District of Columbia that its election law “neither has the purpose nor will have the effect of denying or abridging the right to vote on account of race or color,” or obtains approval for its law from the Attorney General of the United States. *Id.* § 1973c(a).

12. Because Texas is a “covered jurisdiction” under section 5 of the Voting Rights Act, it is not permitted to implement Senate Bill 14 unless the State obtains preclearance from either the Department of Justice or a three-judge panel of this Court. On July 25, 2011, the State of Texas submitted Senate Bill 14 to the Department of Justice for preclearance. Submission Letter, A. McGeehan to T. Herren (July 25, 2011) (Ex. 2).

13. On September 23, 2011, exactly 60 days after Texas had submitted Senate Bill 14 for administrative preclearance, and on the last possible day for DOJ to respond, the Department of Justice sent a letter to the Texas Director of Elections, stating that the information provided in the State’s preclearance submission was “insufficient to enable us to determine that the proposed changes have neither the purpose nor will have the effect of denying or abridging the right to vote on account of race, color, or membership in a language minority group.” Letter, T. Herren to A. McGeehan (Sept. 23, 2011) (Ex. 3). DOJ’s response to the State requested, among other things, that Texas provide:

“a. The number of registered voters in Texas, by race and Spanish surname within county of residence, who currently possess a Texas driver’s license or other form of photo identification issued by DPS that is current or has expired

within sixty days. Please include a description of the manner in which you calculated these numbers;

“b. For the 605,576 registered voters who the State has advised do not have a Texas driver’s license or personal identification card, please provide the number of such persons by Spanish surname, as well as an estimated number by race, within county of residence; and

“c. Describe any and all efforts, other than the requirements outlined in Section 5 of Chapter 123, to provide notice to these individuals of the requirements of S.B. 14 and the availability of a free DPS-issued identification.”

Id. at 2-3.

14. On October 4, 2011, Texas responded to DOJ in a letter that answered DOJ’s questions and attached the data that Texas was capable of providing. Because Texas does not record the race of voters when they register to vote, the State explained that it was unable to determine the racial makeup of registered voters who lack DPS-issued identification. Indeed, the very reason Texas refuses to maintain racial and ethnic data on its list of registered voters is to facilitate a colorblind electoral process, and Texas adopted this race-blind voter-registration policy shortly after the enactment of the 1965 Voting Rights Act. In addition, until 2009, the DPS did not maintain a separate Hispanic category for driver’s license holders to check when providing their racial or ethnic background—which further crimped the State’s ability to calculate racial or ethnic breakdown of those who have (or do not have) DPS-issued photo-identification cards.

15. On November 16, 2011, DOJ responded to Texas's submission of additional information in a letter yet again claiming that the supplemental information provided by the State was "incomplete" and "does not enable us to determine that the proposed changes have neither the purpose nor will have the effect of denying or abridging the right to vote on account of race, color or membership in a language minority group." Letter, T. Herren to A. McGeehan (Nov. 16, 2011) (Ex. 4). This time, DOJ demanded that the State provide a racial breakdown of each *county* of voters that possess DPS-issued identification, which would then be used to extrapolate the racial makeup of that group as compared to the general population.

16. On January 12, 2012, Texas provided the data that DOJ requested along with a letter explaining the State's concerns about the relevance of that data to the law's impact on minority voters. Letter, K. Ingram to T. Herren (Jan. 12, 2012) (Ex. 5).

17. On December 23, 2011, the Department of Justice announced that it denied preclearance to South Carolina's recently enacted Voter-ID Law—notwithstanding the Department of Justice's earlier decision to preclear a similar Voter-ID law in Georgia. In a letter explaining its decision, the Department of Justice cited data showing that 8.4% of white registered voters in South Carolina did not possess a photo identification issued by the State's Department of Motor Vehicles, while 10.0% of "non-white" registered voters in South Carolina did not possess this type of DMV-issued photo

identification. See Letter, T. Perez to C. Jones (Dec. 23, 2011), at 2 (Ex. 6).

The Department of Justice concluded this 1.6% “racial disparit[y]” compelled it to deny preclearance on the ground that South Carolina had “failed to meet its burden of demonstrating that [its Voter-ID law] will not have a retrogressive effect.” See DOJ Letter to S.C. at 4-5. The Department of Justice rejected South Carolina’s Voter-ID law notwithstanding the fact that South Carolina’s law, like Texas’s, provides free photo-identification to voters who lack the identification needed to vote, and permits voters who do not possess government-issued photo identification to cast provisional ballots on Election Day, which will be counted if the voter brings a valid and current photo identification to the county board of registration and elections before certification of the election.

18. Further, the Department of Justice’s letter rejecting South Carolina’s preclearance submission does not make a serious effort to reconcile its decision with the Supreme Court’s ruling in *Crawford*—which not only upheld Indiana’s Voter-ID law as constitutional, but also made clear that photo-identification requirements are “nondiscriminatory” election regulations. See *Crawford*, 553 U.S. at 203 (opinion of Stevens, J.) (upholding Indiana’s photo-identification requirement as “a neutral, *nondiscriminatory* regulation of voting procedure.”); *id.* at 205 (Scalia, J., concurring in the judgment) (The Indiana photo-identification law is a “generally applicable, *nondiscriminatory* voting regulation.”).

19. Similarly, the Department of Justice's letter to South Carolina officials does not acknowledge the serious constitutional questions that arise from DOJ's decision to interpret section 5 in a manner that would preclude covered jurisdictions from enforcing the same type of election-fraud prevention measures that the Supreme Court has upheld as constitutional—and that fall within the States' reserved powers under the Tenth Amendment to the Constitution. *See generally Northwest Austin Mun. Utility Dist. No. One v. Holder*, 557 U.S. 193 (2009).

20. The Department of Justice's letter to South Carolina officials also fails to acknowledge its own previous decision to preclear the Voter-ID law in Georgia, and does not attempt to reconcile the Department's refusal to preclear South Carolina's Voter-ID law with its earlier preclearance rulings.

21. Now, six months after DOJ received Texas's preclearance submission for Senate Bill 14, and after multiple attempts to satisfy DOJ's demands for additional information, the State is still awaiting a preclearance decision from the Department of Justice.

22. In filing this complaint in this Court at this time, Texas assumes that DOJ will apply the same legal analysis and standards that it applied to South Carolina's Voter-ID law. Instead of waiting almost 60 more days, only to meet with further delays and demands from DOJ, and the seeming probability of an eventual rejection of Senate Bill 14 by DOJ, Texas files this complaint seeking judicial preclearance.

V. CLAIM FOR RELIEF

The State of Texas is entitled to a declaratory judgment granting preclearance to Senate Bill 14 under section 5 of the Voting Rights Act because Senate Bill 14 has neither the purpose nor the effect of denying or abridging the right to vote on account of race, color, or membership in a language minority and otherwise fully complies with section 5 of the Voting Rights Act.

23. The allegations in paragraphs 6 – 22 are reincorporated herein.

A. Senate Bill 14 does not “deny or abridge” the right to vote.

24. The State of Texas respectfully requests a declaration from this Court that Senate Bill 14 does not “deny or abridge” the right to vote within the meaning of section 5, nor was it enacted with this purpose. Section 5 does not preclude covered jurisdictions from enacting generally applicable fraud-prevention laws, such as Senate Bill 14, that entail minor inconveniences on exercising the right to vote—especially when the covered jurisdiction mitigates those inconveniences through the mechanisms of free photo-ID cards and provisional ballots. For example, laws requiring that citizens register to vote prior to election day impose inconveniences that are similar to the one required by Senate Bill 14. But neither of these laws “denies” or “abridges” the right to vote.

25. Laws requiring voters to present proper identification at polling places are common. At the time of this complaint, no fewer than 31 States require voters to present some type of identification when voting at the polls. See <http://www.ncsl.org/legislatures-elections/elections-campaigns/voter-id->

state-requirements.aspx. Further, 15 States have enacted laws that require voters to present a photo identification. *Id.*

26. These laws do not “deny” or “abridge” anyone’s right to vote—a voter needs only to bring identification to the polls, and, in Texas, if a voter fails to bring the required government-issued photo identification to the polls then he can cast a provisional ballot that will be counted if the voter presents the required identification to the voter registrar within six days of the election. In addition, voters can obtain photo identification *free of charge* at any time, at their convenience, before the election—or after casting a provisional ballot—if they lack an acceptable form of government-issued identification.

27. DOJ’s letter to South Carolina reflects a belief that *any* law that imposes even the *slightest* inconvenience on one’s ability to vote represents a “denial” or “abridgement” of the right to vote—even when the State accommodates those who do not possess a photo identification by offering photo identification free of charge and by allowing voters without photo identification to cast provisional ballots. That is not a tenable construction of the Voting Rights Act, and it cannot be reconciled with the Supreme Court’s ruling in *Crawford*. See 553 U.S. at 198 (opinion of Stevens, J.) (“[T]he inconvenience of making a trip to the DMV, gathering the required documents, and posing for a photograph *surely does not qualify as a substantial burden on the right to vote, or even represent a significant increase*

over the usual burdens of voting.") (emphasis added); *id.* at 209 (Scalia, J. concurring in the judgment) ("The universally applicable requirements of Indiana's voter-identification law are eminently reasonable. The burden of acquiring, possessing, and showing a free photo identification is simply not severe, because it does not "even represent a significant increase over the usual burdens of voting." And the State's interests are sufficient to sustain that minimal burden.") (internal citations omitted).

28. The Supreme Court's ruling in *Crawford* also recognizes that allowing voters to cast provisional ballots mitigates any "burdens" that photo-identification requirements might otherwise impose on the right to vote. See *Crawford*, 553 U.S. at 199 ("The severity of that burden is, of course, mitigated by the fact that, if eligible, voters without photo identification may cast provisional ballots that will ultimately be counted."). Sections 17 and 18 of Senate Bill 14 allow voters who appear at the polls without the required identification to cast provisional ballots, an allowance that defeats any claim that the photo-identification requirement "denies" or "abridges" anyone's right to vote. Unlike many other voting changes that may actually prevent someone from participating in an election, Senate Bill 14's requirements will affect only the ballots of those who *choose* not to obtain the required identification that the State offers free of charge—either before the election or (for those who cast provisional ballots) in the six-day window following the election.

B. Senate Bill 14 does not deny or abridge the right to vote “on account of race or color.”

29. The State of Texas respectfully requests a declaration from this Court that Senate Bill 14 does not deny or abridge the right to vote “on account of race or color,” and that it was not enacted with that purpose. As the Supreme Court recognized in *Crawford*, photo-identification laws are “nondiscriminatory”; they apply to all voters regardless of race and they affect only those voters who choose not to obtain a photo identification (which the State offers free of charge) and present it either at the polls or to the voting registrar after casting a provisional ballot.

30. Even if minorities may be statistically less likely than whites to currently possess a government-issued photo identification (as DOJ asserts in its letter to South Carolina), that does not establish a section 5 violation. Section 5 precludes covered jurisdictions from enforcing those laws that have the “purpose” or “effect” of “denying or abridging the right to vote *on account of race or color*.” See § 1973c(a) (emphasis added). Even if DOJ contends that Senate Bill 14 has the unintended effect of “denying” or “abridging” the voting rights of those who do not possess a government-issued photo identification, it does not do so *on account of their race or color*—it does so on account of their decision not to obtain the identification that the State offers free of charge.

31. The Department of Justice's Letter to South Carolina asserts that section 5 jurisdictions are forbidden to enforce any Voter-ID law that will "lead to a retrogression in the position of racial minorities with respect to their effective exercise of the electoral franchise." See DOJ Letter at 1 (quoting *Beer v. United States*, 425 U.S. 130, 141 (1976)). This approach is irreconcilable with the language of section 5, which protects persons of *all* races from new voting laws that have the effect of denying or abridging the right to vote *on account of race or color*. Nothing in section 5 authorizes the Department of Justice or this Court to withhold preclearance from a neutral, nondiscriminatory voter-identification law simply because DOJ believes the law may have a disparate impact on minority voters—or white voters. The existing patterns of photo-ID possession will always vary somewhat by race, so these laws will *always* have a temporary differential effect on *some* race.

32. Section 5 *does* allow DOJ or this Court to withhold preclearance from voting qualifications that were enacted with the purpose of denying or abridging the voting rights of a particular race, or facially neutral voting qualifications that may have been enacted with benign motivations but that are *administered* by racially biased election officials who selectively enforce these laws to deny blacks the right to vote *on account of their race*. See, e.g., *South Carolina v. Katzenbach*, 383 U.S. 301, 312-13 (1966). But Texas's Voter-ID law was not enacted with the purpose of disenfranchising minority

voters, and there is not even a suggestion that the State would administer those laws in a racially biased manner.

33. *Beer's* “nonretrogression” construction of section 5 arose from a case involving legislative reapportionment and must be limited to that context. *See Beer*, 425 U.S. at 141 (“It is thus apparent that *a legislative reapportionment that enhances the position of racial minorities with respect to their effective exercise of the electoral franchise can hardly have the ‘effect’ of diluting or abridging the right to vote on account of race within the meaning of § 5.*”); *see also Reno v. Bossier Parish School Bd.*, 528 U.S. 320, 329 (2000) (“In *Beer v. United States*, 425 U.S. 130 (1976), this Court addressed the meaning of the no-effect requirement *in the context of an allegation of vote dilution.*”) (emphasis added). The inherently unique nature of the reapportionment process is such that redistricting is fundamentally distinct from laws that govern the administration of elections or ballot-box integrity.

34. Extending “retrogressive effects” analysis to Voter-ID laws, by denying preclearance to any voter requirement that has an unintended disparate impact on minority voters, would present serious constitutional questions. The Fifteenth Amendment prohibits only voting restrictions that are *motivated by racial discrimination*. *See City of Mobile v. Bolden*, 446 U.S. 55, 62 (1980) (“[R]acially discriminatory motivation is a necessary ingredient of a Fifteenth Amendment violation.”). If the Department of Justice’s

apparent construction of section 5 operated to block Texas's Voter-ID law solely because it *may* have a *disparate impact* on racial minorities, then this Court will have to confront whether this interpretation of section 5 represents a permissible exercise of Congress's enforcement power under the Fifteenth Amendment. *See generally City of Boerne v. Flores*, 521 U.S. 507 (1997); *Nw. Austin Mun. Util. Dist. No. One v. Holder*, 129 S. Ct. 2504 (2009). Courts must adopt any reasonably permissible construction of section 5 that will avoid these constitutional concerns. *See Nw. Austin*, 129 S. Ct. at 2511-14. To do that, this Court must cabin the "nonretrogressive effects" test to the context of legislative redistricting.

35. Even if non-retrogression extends beyond redistricting, it still should not extend to a law that imposes a temporary inconvenience no greater than the inherent inconvenience of voting. Whatever the initial disproportionate impact based on a snapshot of current patterns of photo-ID possession, those patterns are easily changed and cannot be the basis for a finding of disproportionate or retrogressive impact.

C. The Court must interpret section 5 of the Voting Rights Act to permit preclearance of Senate Bill 14 in order to avoid the grave constitutional question whether section 5 exceeds Congress's enforcement power under section 2 of the Fifteenth Amendment.

36. Any construction of section 5 that precludes Texas from implementing its Voter-ID Law will exceed Congress's enforcement power

under section 2 of the Fifteenth Amendment, or will at the very least present grave constitutional questions that this Court must avoid. A finding that covered jurisdictions cannot adopt a commonsense voting change already found to be non-discriminatory by the Supreme Court would highlight the constitutional difficulties with section 5. Accordingly, this Court must interpret section 5 in a manner that authorizes preclearance in this case. See *Nw. Austin*, 129 S. Ct. at 2511-14.

37. Section 2 of the Fifteenth Amendment empowers Congress to “enforce” the Fifteenth Amendment with “appropriate” legislation. This enforcement prerogative might permit Congress to enact laws that empower DOJ or this Court to deny preclearance to state laws *that actually violate* the Fifteenth Amendment. See *South Carolina v. Katzenbach*, 383 U.S. 301, 334 (1966) (“The Act suspends new voting regulations pending scrutiny by federal authorities *to determine whether their use would violate the Fifteenth Amendment.*”) (emphasis added). But, as the Supreme Court recognized in *South Carolina*, placing the States under this form of administrative receivership pushes the constitutional boundaries of Congress’s enforcement power under the Fifteenth Amendment. *Id.*

38. The Texas Voter-ID law does not violate the Fifteenth Amendment because it was not enacted with a racially discriminatory purpose. See *City of Mobile v. Bolden*, 446 U.S. 55, 62 (1980). In addition, the Supreme Court has explicitly upheld photo-identification laws against

constitutional challenges, declaring that these laws represent “nondiscriminatory” regulations of elections. See *Crawford*, 553 U.S. at 203 (opinion of Stevens, J.); *id.* at 205 (Scalia, J., concurring in the judgment). It is tenuous enough for a federal court or the Department of Justice to deny preclearance to a voting qualification that does not violate the Fifteenth Amendment; these constitutional concerns are further aggravated when preclearance is withheld from a law that the Supreme Court of the United States has explicitly upheld as constitutional.

39. Although the State of Texas does not deny that the Constitution may empower Congress to enact prophylactic legislation that extends beyond the self-executing right established in section 1 of the Fifteenth Amendment, any attempt by Congress to invoke its powers in this prophylactic manner necessarily raises serious constitutional questions. That is nowhere more obvious than in the case of section 5 of the Voting Rights Act, which represents an enormous intrusion into state sovereignty by reversing the bedrock assumption that duly enacted (and constitutional) state laws may take immediate effect. Accordingly, Congress is required to state its extra-constitutional prohibitions in clear and explicit language and justify this prophylaxis with legislative findings. See, e.g., *Katzenbach v. Morgan*, 384 U.S. 641 (1966) (upholding a congressional prohibition on literacy tests only after noting “evidence suggesting that prejudice played a prominent role in the enactment of the [literacy-test] requirement”); *Oregon v. Mitchell*, 400

U.S. 112 (1970) (opinion of Black, J) (upholding a federal ban on literacy tests that was based on a congressional finding that “literacy tests have been used to discriminate against voters on account of their color.”). *See also Bd. of Trustees of the Univ. of Alabama v. Garrett*, 531 U.S. 356 (2001); *Kimel v. Florida Board of Regents*, 528 U.S. 62 (2000); *City of Boerne v. Flores*, 521 U.S. 507 (1997). The language of section 5 falls far short of the clear statement needed for this Court to even consider denying preclearance to the perfectly constitutional Voter-ID law that Texas has enacted.

40. The interpretation of section 5 that the Department of Justice adopted in its letter to South Carolina will establish a preclearance obstacle that sweeps far beyond what is necessary to enforce the Fifteenth Amendment. Both the Fourteenth and Fifteenth Amendments prohibit only those voting restrictions that are *motivated* by racial discrimination. *See City of Mobile v. Bolden*, 446 U.S. 55 (1980). To the extent that section 5 blocks laws that are free from racially discriminatory motives, it can survive only if its prophylactic scope satisfies the “congruent” and “proportional” test of *City of Boerne v. Flores*, 521 U.S. 507 (1997). Congress enacted the VRA ‘to make the guarantees of the Fifteenth Amendment finally a reality for all citizens,’ *Allen v. State Bd. of Elections*, 393 U.S. 544, 556 (1969), not to empower the Department of Justice to block States from enacting laws that do not violate the Fifteenth Amendment and that the Supreme Court has expressly upheld as constitutional.

41. There is no conceivable justification for construing section 5 in a manner that would enable DOJ or the federal courts to deny administrative preclearance to a law that the Supreme Court has already determined is non-discriminatory. Nor is there any justification for requiring Texas and South Carolina to wait for permission from DOJ (or a federal district court) before implementing their photo-identification laws. *Crawford* shows that litigants can bring immediate challenges to new voting requirements that are believed to disproportionately affect minorities, by invoking the Fourteenth and Fifteenth Amendments and section 2 of the VRA. And a district court can promptly issue a temporary restraining order or a preliminary injunction if the plaintiffs demonstrate a likelihood of success on the merits.

D. The Court must interpret section 5 of the Voting Rights Act to permit preclearance of Senate Bill 14 in order to avoid the grave constitutional question whether section 5 violates the Tenth Amendment.

42. Any construction of section 5 that precludes Texas from implementing its Voter-ID Law will violate the Tenth Amendment by denying covered jurisdictions the powers reserved to them under that amendment, or will at the very least present grave constitutional questions that this Court must avoid by interpreting section 5 to allow for preclearance in this case.

43. Although the Supreme Court in *Crawford* did not directly address the Tenth Amendment, by upholding Indiana's Voter-ID law the

Court effectively recognized that the States enjoy a reserved power under the Tenth Amendment to require voters to present photo identification at the polls—at least when appearing to vote for state and local officials. Congress therefore has no power to enact legislation to nullify Indiana’s Voter-ID law for state and local elections. *See, e.g., Oregon v. Mitchell*, 400 U.S. 112, 125 (1970) (opinion of Black, J.) (“No function is more essential to the separate and independent existence of the States and their governments than the power to determine within the limits of the Constitution the qualifications of their own voters for state, county, and municipal offices and the nature of their own machinery for filling local public offices.”). It follows that Congress cannot empower the Department of Justice or the federal courts to block Texas from requiring photo identification when conducting elections for state and local officials.

E. The Court should interpret section 5 of the Voting Rights Act in a manner that permits preclearance of Senate Bill 14 in order to avoid the grave constitutional question whether section 5 violates Texas’s right to “equal sovereignty.”

44. Section 5, if interpreted to forbid Texas to enforce its Voter-ID law, violates constitutional principles of federalism and state sovereignty by depriving Texas of equal sovereignty with other States.

45. Other States, such as Indiana, Kansas, and Wisconsin, have been able to enact and enforce similar laws without interference from DOJ.

Yet Texas is denied that ability to implement election-fraud prevention laws. This creates a two-tracked system of sovereignty, in which States such as Indiana, Kansas, and Wisconsin can enforce their photo-identification requirements, but Texas and South Carolina cannot, even though all of these state laws comply with the Constitution. As Justice Kennedy has aptly noted, "Texas is at a tremendous disadvantage" as result of the fact that "section 5 applies only to some States and not others." Oral Argument Transcript, *Perry v. Perez*, No. 11-713, at 38 Tr. 5-11 (Jan. 9, 2012). Worse, under DOJ's interpretation of section 5, Georgia can enforce its photo-identification requirements simply because it was fortuitous enough to seek administrative preclearance during a previous Administration.

46. Section 5, if interpreted to preclude preclearance of Senate Bill 14, relegates Texas to a diminished tier of sovereignty by disabling Texas from implementing a legitimate election fraud-prevention device. See *Crawford v. Marion County Election Board*, 553 U.S. 181, 196 (2008) (opinion of Stevens, J.) ("There is no question about the legitimacy or importance of the State's interest in counting only the votes of eligible voters. Moreover, the interest in orderly administration and accurate recordkeeping provides a sufficient justification for carefully identifying all voters participating in the election process."); *id.* at 196-197 ("[T]he fact of inflated voter rolls does provide a neutral and nondiscriminatory reason supporting the State's decision to require photo identification."). "Non-retrogression" cannot be invoked to

prohibit covered jurisdictions (such as Texas and South Carolina) from enacting *constitutional* fraud-prevention devices that non-covered jurisdictions (such as Indiana, Kansas, and Wisconsin) may implement.

VI. DEMAND FOR JUDGMENT

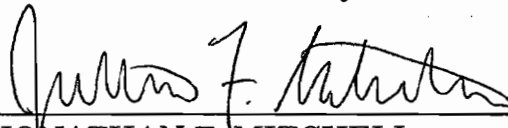
The State of Texas respectfully requests the following relief from the Court:

- A. A declaratory judgment that Senate Bill 14 may take effect immediately because it neither has the purpose nor will have the effect of denying or abridging the right to vote on account of race or color, nor will it deny or abridge the right of any citizen of the United States to vote because he is a member of a language minority group.
- B. All other relief to which the State of Texas may show itself to be entitled.

Respectfully submitted.

GREG ABBOTT
Attorney General of Texas

DANIEL T. HODGE
First Assistant Attorney General


JONATHAN F. MITCHELL
Solicitor General

ADAM W. ASTON
ARTHUR C. D'ANDREA
JAMES P. SULLIVAN
Assistant Solicitors General

209 West 14th Street
P.O. Box 12548
Austin, Texas 70711-2548
(512) 936-1695

Dated: Jan. 23, 2012

Exhibit 5

The State of Texas



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

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

Hope Andrade
Secretary of State

January 12, 2012

Mr. T. Christian Herren, Jr.
Voting Section
Civil Rights Division
United States Department of Justice
950 Pennsylvania Avenue, NW
Washington D.C. 20530

VIA FACSIMILE 202-616-9514

Re: Submission under Section 5, Voting Rights Act, of
Senate Bill 14, Chapter 123, 82nd Legislature,
2011; File No. 2011-2775.

Dear Mr. Herren:

In connection with the submission by the State of Texas for pre-clearance of Senate Bill 14, Chapter 123, 82nd Legislature 2011, which concerns photo identification for in person voting, you have asked us to provide the Department of Justice (DOJ) with additional information beyond that already provided by the State. Specifically, you have required Texas to identify:

The number of registered voters in Texas by race and Spanish surname within county of residence, who currently possess a Texas driver's license or other form of photo identification issued by [the Department of Public Safety (DPS)] that is current or has expired within sixty days.

By requesting Spanish surname data, the DOJ's request acknowledges that the DPS database does not accurately reflect the number of Hispanic voters in Texas who possess a driver's license or photo identification card. Nonetheless, in a good faith attempt to satisfy DOJ's request, the State has compiled the requested data--despite the State's reservations about the reliability of that data.

Shortly after passage of the federal Voting Rights Act in 1965, the State of Texas adopted a policy to not require Texans provide their race or ethnicity when registering to vote. As a result, Texas does not maintain any race or ethnicity data for its list of registered voters. As explained in a previous communication with your office, Texas' decision to eliminate race as a factor in its voter registration process makes it impossible to generate fully reliable data in response to your request. Nonetheless, the State of Texas and the agencies working to respond to this request—including the Secretary of State's Office, The Department of Public Safety, and the Attorney General's Office—have assembled data as directed by you.

Mr. T. Christian Herren, Jr.

Page 2

DOJ's directive that the State of Texas identify Hispanic voters by matching voter registration lists with lists of licensed drivers and personal ID holders also produces inaccurate and unreliable data because prior to May 2010 the Department of Public Safety did not list Hispanic as a race that driver's license and personal identification applicants could select. Prior to May 2010, the DPS followed federal Office of Management and Budget guidelines, which does not categorize Hispanic as a "race." Thus, in following DOJ's directive to match voter registration lists with lists of driver's license and ID holders produces anomalous and highly misleading results. Due to the recent addition of a "Hispanic" field to the driver's license and personal ID application, the number of Hispanic ID-holders in Texas is exponentially higher than the DPS's raw data indicates.

The following summarizes factors that raise questions about the reliability of the data compiled in response to the DOJ's request and reveals why that data very likely undercounts the number of voters--minority and otherwise--who possess a DPS-issued photo identification:

- Voters are not asked to provide their race or ethnicity when registering to vote in Texas.
- DPS previously used the following racial classifications on all ID applications: American Indian/Alaskan Native, Asian/Pacific Islander, Black, Other, and White. Not until May 2010 did ID applications at DPS offices across the State contain a field for "Hispanic."
- It is impossible to identify which racial classifications Texans of Hispanic descent selected on ID applications completed prior to May 2010. For this reason, DPS's data for racial classifications other than Hispanic are no doubt significantly distorted.
- In attempting to match names between Texas's race-neutral list of registered voters and the DPS's list of driver's license and ID holders, a number of very common irregularities causes numerous incorrect "no-match" results. These include name changes, inconsistent use of nicknames or initials, inconsistent placement of suffixes such as "Jr." or "III," misspellings, transposed or illegible digits in the ID number provided by the voter, clerical data-entry errors. Simply put, these databases were not designed to be merged. Due to the many difficulties associated with attempting to merge the two databases, the number of "no-match" entries reflected in our response is significantly higher than the actual number of registered voters in Texas who lack an ID.
- The Hispanic-surname analysis you request is an imprecise substitute for accurate racial data. It is impossible to know whether a surname is representative of a voter's race, or the result of any number of legal name changes resulting from actions such as marriage, adoption, or a legal change of identity.. Indeed, in merging the State's list of Spanish-surnamed registered voter with DPS records containing racial classification data, many individual Texans have mismatched ethnicities between the two databases.
- While we have attempted to respond to your directive, given the data available to us, we note that your directive does not take into account the number of registered voters in Texas who possess another form of photo identification that can be used for in-person voting under Senate Bill 14, including a Concealed Carry Permit issued by DPS, a United States Passport, a U.S. Certificate of citizenship, or a United States Military Identification card.
- Further, your request does not account for Texans who will obtain a free Election Identification Card from DPS.

Mr. T. Christian Herren, Jr.
Page 3

Despite these difficulties, all of the agencies involved in this endeavor have made a good faith effort to respond to your request and to cooperate throughout the administrative preclearance process so that preclearance and implementation of Senate Bill 14 can occur as soon as possible. Furthermore, in spite of these difficulties and the resulting unreliability of the numbers, you have indicated that you will deny preclearance of Senate Bill 14 if our office fails to respond to your most recent request for additional information. Therefore, in response to your request, the State of Texas provides the attached Exhibits described below. For reasons stated above and in previous communications, this data does not provide an accurate picture of the racial makeup of registered voters or ID holders in Texas, in large part because of the State of Texas' decision to eliminate race as a factor in its voter registration process. However, these Exhibits represent the State's good-faith attempt to respond to your directive.

Column A of Exhibit A is an updated count of registered voters by county in the State of Texas.

Column B of Exhibit A provides the total number of registered voters by county who provided a DPS ID number to us when they registered to vote, plus those of the remaining registered voters whom we were able to match to a high degree of confidence with an entry in the DPS database, which includes racial identification information. As explained above, Column B significantly undercounts the actual number of registered voters with an ID because of the many difficulties in accurately matching the race-neutral registered voter list to the DPS database that includes racial identification information. The numbers in Column B, however, are the closest that we can get to an accurate number given the data limitations.

Column C of Exhibit B contains the number of registered voters by county that we were able to match to a high degree of confidence with an entry in the DPS database. As explained above, Column C significantly undercounts the actual number of registered voters with an ID because of the many difficulties in accurately matching the race-neutral registered voter list to the DPS database that includes racial classification information. It also significantly undercounts the number of registered voters with an ID because it does not include voters who provided an ID when they registered to vote but who, for whatever reason, could not be matched with a high degree of confidence to an entry in the DPS database containing racial identification information. As a result, the number in Column C is lower than, and less accurate than, the number in Column B for the same county. Given the data limitations explained above, however, this is the only count of registered voters for which we can provide information on race or ethnicity.

Column D of Exhibit B contains the racial information provided to DPS for all registered voters counted in Column C of Exhibit B. For the reasons explained above, this data is not fully reliable and is misleading — due to DPS's evolving methods of collecting information on race and ethnicity. (In addition, Column C of Exhibit B significantly undercounts the number of registered voters who have an ID.) Because of limitations in the data, however, we were forced to use the racial breakdown of this group as the basis for estimating the racial breakdown of the more accurate (though still incomplete) count of registered voters with ID listed in Column B of Exhibit A.

Column E of Exhibit A is an estimation of the racial breakdown of all voters counted in Column B of Exhibit A. To reach this estimate, we applied the racial percentages by county found in Column D of Exhibit B to the more accurate (though still incomplete) count of registered voters with ID found in Column B of Exhibit A.

Mr. T. Christian Herren, Jr.

Page 4

Column F of Exhibit A contains Spanish-surname data for the registered voters by county contained in Column B of Exhibit A. We previously provided you with Spanish-surname data for all registered voters. We note that the Spanish-surname data has flaws as a proxy for racial information and that in merging the State's list of Spanish-surnamed registered voters with DPS records containing racial identification data, many individual Texans have mismatched ethnicities between the two databases.

The attached Exhibits represent the good-faith effort of the State of Texas to respond to your most recent request for information despite the many limitations in the data available to us. Please do not hesitate to contact me with any questions or concerns about this response.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Keith Ingram', with a long, sweeping horizontal line extending to the right.

Keith Ingram
Director of Elections

c: Office of the Attorney General
Department of Public Safety

KI:EHW:id

EXHIBIT A

EXHIBIT A		A	B	E														F		
				Hispanic (tracked since 2009)		American Indian/Alaskan Native		Asian/Pacific Islander		Black		White		Other		No Ethnicity				Total SOS Spanish
				DPS ETHNICITY		DPS ETHNICITY		DPS ETHNICITY		DPS ETHNICITY		DPS ETHNICITY		DPS ETHNICITY		DPS ETHNICITY				
County Code	County Name	VR	Total Matches plus ID	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	
001	ANDERSON	25,810	24,239	103	0.42%	22	0.09%	67	0.28%	3,107	12.82%	20,705	85.42%	233	0.96%	3	0.01%	1,266	5.22%	
002	ANDREWS	7,958	7,460	498	6.68%	15	0.20%	18	0.25%	120	1.61%	6,786	90.97%	21	0.28%	1	0.02%	2,528	33.89%	
003	ANGELINA	47,132	44,226	145	0.33%	43	0.10%	118	0.27%	6,038	13.65%	37,523	84.84%	354	0.80%	6	0.01%	3,640	8.23%	
004	ARANSAS	14,943	14,522	178	1.23%	25	0.18%	146	1.01%	120	0.82%	13,989	96.33%	63	0.43%	1	0.01%	2,138	14.72%	
005	ARCHER	6,186	5,869	6	0.11%	8	0.14%	13	0.22%	16	0.27%	5,816	99.10%	8	0.14%	1	0.02%	140	2.39%	
006	ARMSTRONG	1,404	1,257	1	0.09%	3	0.26%	0	0.00%	3	0.26%	1,246	99.15%	3	0.26%	0	0.00%	39	3.10%	
007	ATASCOSA	23,266	21,528	1,163	5.40%	24	0.11%	28	0.13%	108	0.50%	19,528	90.71%	675	3.14%	1	0.01%	10,901	50.64%	
008	AUSTIN	17,522	16,812	129	0.77%	11	0.06%	45	0.27%	1,429	8.50%	14,690	87.38%	506	3.01%	2	0.01%	1,673	9.95%	
009	BAILEY	3,381	3,175	117	3.69%	6	0.20%	6	0.20%	39	1.23%	2,991	94.20%	13	0.40%	3	0.08%	1,192	37.54%	
010	BANDERA	14,214	13,958	97	0.69%	18	0.13%	33	0.24%	39	0.28%	13,714	98.25%	54	0.39%	3	0.02%	1,489	10.67%	
011	BASTROP	39,058	37,516	314	0.84%	38	0.10%	95	0.25%	2,822	7.52%	33,784	90.05%	459	1.22%	6	0.01%	5,212	13.89%	
012	BAYLOR	2,526	2,393	5	0.19%	1	0.05%	2	0.10%	38	1.58%	2,343	97.89%	5	0.19%	0	0.00%	177	7.40%	
013	BEE	14,365	13,324	208	1.56%	12	0.09%	31	0.23%	225	1.69%	12,233	91.81%	616	4.63%	0	0.00%	7,183	53.91%	
014	BELL	149,320	140,855	1,600	1.14%	288	0.20%	2,674	1.90%	29,867	21.20%	100,991	71.70%	5,406	3.84%	29	0.02%	16,732	11.88%	
015	BEXAR	863,645	792,567	33,386	4.21%	723	0.09%	10,653	1.34%	64,728	8.17%	660,746	83.37%	22,227	2.80%	104	0.01%	334,289	42.18%	
016	BLANCO	6,911	6,678	29	0.44%	3	0.05%	14	0.21%	49	0.73%	6,559	98.22%	22	0.32%	2	0.03%	588	8.81%	
017	BORDEN	435	402	0	0.00%	0	0.00%	1	0.26%	0	0.00%	400	99.47%	1	0.26%	0	0.00%	24	5.97%	
018	BOSQUE	11,608	11,059	54	0.49%	4	0.04%	8	0.07%	161	1.45%	10,795	97.61%	37	0.33%	1	0.01%	744	6.73%	
019	BOWIE	54,818	51,568	27	0.05%	53	0.10%	122	0.24%	9,779	18.96%	41,314	80.11%	261	0.51%	12	0.02%	869	1.69%	
020	BRAZORIA	168,520	163,171	1,993	1.22%	133	0.08%	4,321	2.65%	19,107	11.71%	131,743	80.74%	5,856	3.59%	18	0.01%	25,806	15.82%	
021	BRAZOS	85,356	82,437	752	0.91%	61	0.07%	985	1.19%	8,440	10.24%	71,551	86.79%	638	0.77%	10	0.01%	9,371	11.37%	
022	BREWSTER	6,390	5,732	163	2.84%	6	0.10%	16	0.28%	66	1.15%	5,437	94.85%	40	0.70%	5	0.08%	1,611	28.11%	
023	BRISCOE	1,140	1,044	19	1.79%	1	0.11%	0	0.00%	18	1.68%	990	94.84%	15	1.46%	1	0.11%	150	14.37%	
024	BROOKS	6,607	4,498	302	6.72%	1	0.03%	4	0.09%	12	0.27%	4,136	91.94%	40	0.89%	3	0.06%	4,006	89.06%	
025	BROWN	21,735	20,760	43	0.21%	20	0.10%	39	0.19%	583	2.81%	19,998	96.33%	75	0.36%	2	0.01%	2,116	10.19%	
026	BURLESON	10,548	9,734	74	0.76%	3	0.03%	14	0.15%	1,036	10.64%	8,475	87.07%	129	1.33%	2	0.02%	895	9.19%	
027	BURNET	25,484	24,887	60	0.24%	17	0.07%	58	0.23%	241	0.97%	24,432	98.17%	75	0.30%	4	0.02%	1,947	7.82%	
028	CALDWELL	19,637	18,102	635	3.51%	18	0.10%	36	0.20%	1,282	7.08%	15,783	87.19%	341	1.88%	7	0.04%	5,594	30.90%	
029	CALHOUN	12,121	11,238	82	0.73%	5	0.04%	194	1.73%	328	2.92%	10,257	91.27%	373	3.32%	0	0.00%	3,780	33.64%	
030	CALLAHAN	8,585	8,049	25	0.31%	55	0.68%	13	0.16%	50	0.63%	7,884	97.95%	21	0.27%	1	0.01%	360	4.47%	
031	CAMERON	170,543	144,297	14,104	9.77%	53	0.04%	552	0.38%	623	0.43%	126,860	87.92%	2,049	1.42%	55	0.04%	106,956	74.12%	
032	CAMP	6,938	6,427	13	0.20%	13	0.20%	20	0.31%	1,179	18.34%	5,132	79.84%	69	1.07%	2	0.03%	366	5.69%	
033	CARSON	4,217	3,919	6	0.16%	3	0.08%	2	0.05%	9	0.22%	3,888	99.21%	11	0.27%	0	0.00%	190	4.85%	
034	CASS	17,924	16,605	3	0.02%	11	0.07%	9	0.05%	2,404	14.48%	14,105	84.95%	70	0.42%	2	0.01%	201	1.21%	
035	CASTRO	4,077	3,588	277	7.71%	7	0.21%	6	0.17%	57	1.58%	3,023	84.24%	218	6.06%	1	0.03%	1,392	38.80%	
036	CHAMBERS	23,277	22,034	91	0.41%	19	0.09%	117	0.53%	1,892	8.59%	19,620	89.04%	293	1.33%	3	0.02%	1,819	8.26%	
037	CHEROKEE	26,342	25,454	33	0.13%	24	0.10%	52	0.20%	3,318	13.03%	21,894	86.01%	132	0.52%	1	0.00%	1,393	5.47%	
038	CHILDRESS	3,526	3,241	16	0.48%	7	0.21%	6	0.17%	124	3.82%	3,071	94.76%	17	0.52%	1	0.03%	398	12.28%	
039	CLAY	7,592	7,206	7	0.10%	12	0.16%	7	0.10%	16	0.22%	7,149	99.21%	13	0.18%	2	0.03%	169	2.35%	
040	COCHRAN	1,757	1,555	104	6.72%	1	0.08%	0	0.00%	69	4.45%	1,374	88.38%	6	0.38%	0	0.00%	586	37.68%	
041	COKE	2,346	2,169	9	0.41%	1	0.05%	0	0.00%	2	0.10%	2,150	99.12%	7	0.31%	0	0.00%	250	11.53%	
042	COLEMAN	6,006	5,715	38	0.67%	9	0.15%	7	0.11%	92	1.61%	5,558	97.25%	11	0.19%	1	0.02%	587	10.27%	
043	COLLIN	427,811	418,214	1,367	0.33%	641	0.15%	16,209	3.88%	34,075	8.15%	362,485	86.67%	3,388	0.81%	50	0.01%	25,216	6.03%	
044	COLLINGSWORTH	1,847	1,620	12	0.73%	5	0.33%	0	0.00%	58	3.60%	1,535	94.73%	10	0.60%	0	0.00%	196	12.10%	
045	COLORADO	13,003	12,242	46	0.37%	6	0.05%	13	0.11%	1,489	12.16%	10,448	85.34%	239	1.95%	2	0.02%	1,588	12.97%	
046	COMAL	73,754	71,512	703	0.98%	72	0.10%	316	0.44%	972	1.36%	68,336	95.56%	1,107	1.55%	7	0.01%	10,643	14.88%	
047	COMANCHE	8,862	8,104	47	0.58%	7	0.08%	11	0.14%	11	0.14%	7,844	96.80%	183	2.26%	1	0.01%	902	11.13%	
048	CONCHO	1,664	1,558	19	1.23%	0	0.00%	2	0.14%	9	0.58%	1,523	97.76%	5	0.29%	0	0.00%	362	23.23%	
049	COOKE	22,736	21,792	113	0.52%	32	0.15%	70	0.32%	519	2.38%	21,008	96.40%	46	0.21%	4	0.02%	1,026	4.71%	
050	CORYELL	33,662	31,788	119	0.38%	84	0.27%	457	1.44%	4,241	13.34%	25,938	81.60%	944	2.97%	4	0.01%	2,861	9.00%	
051	COTTELL	1,124	1,035	6	0.57%	4	0.34%	0	0.00%	84	8.11%	937	90.51%	5	0.46%	0	0.00%	144	13.91%	
052	CRANE	2,366	2,166	167	7.25%	1	0.05%	6	0.26%	63	2.89%	1,928	89.03%	1	0.05%	0	0.00%	829	38.27%	
053	CROCKETT	2,524	2,239	50	2.25%	1	0.05%	5	0.21%	6	0.27%	2,170	96.90%	6	0.27%	1	0.05%	1,083	48.37%	
054	CROSBY	3,618	3,074	79	2.56%	4	0.12%	2	0.08%	96	3.11%	2,865	93.19%	28	0.90%	1	0.04%	1,262	41.05%	
055	CULBERSON	1,721	1,444	99	6.85%	4	0.26%	5	0.35%	9	0.61%	1,321	91.51%	6	0.43%	0	0.00%	978	67.73%	
056	DALLAM	2,923	2,678	34	1.28.															

EXHIBIT A

County Code		County Name		A		B		E																F	
								Hispanic (tracked since 2009)		American Indian/Alaskan Native		Asian/Pacific Islander		Black		White		Other		No Ethnicity		Total SOS Spanish			
								DPS ETHNICITY		DPS ETHNICITY		DPS ETHNICITY		DPS ETHNICITY		DPS ETHNICITY		DPS ETHNICITY		DPS ETHNICITY		DPS ETHNICITY			
		VR		Total Matches plus ID		Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%				
088	GOLIAD	5,378	4,831	29	0.61%	5	0.09%	2	0.05%	181	3.75%	4,581	94.82%	31	0.63%	2	0.05%	1,291	26.72%						
089	GONZALES	12,370	11,183	179	1.60%	1	0.01%	14	0.12%	868	7.76%	9,753	87.21%	366	3.28%	2	0.02%	3,319	29.68%						
090	GRAY	12,697	11,887	26	0.22%	25	0.21%	12	0.10%	279	2.35%	11,307	95.12%	237	1.99%	1	0.01%	1,131	9.51%						
091	GRAYSON	71,150	68,528	93	0.14%	206	0.30%	244	0.36%	3,497	5.10%	63,962	93.34%	518	0.76%	9	0.01%	2,445	3.57%						
092	GREGG	64,783	61,139	113	0.19%	78	0.13%	260	0.43%	11,497	18.81%	49,032	80.20%	150	0.25%	9	0.01%	2,677	4.38%						
093	GRIMES	14,218	13,587	74	0.55%	8	0.06%	23	0.17%	1,930	14.21%	11,353	83.56%	196	1.44%	2	0.02%	1,181	8.69%						
094	GUADALUPE	74,153	71,216	1,176	1.65%	80	0.11%	727	1.02%	4,876	6.85%	62,777	88.15%	1,572	2.21%	8	0.01%	15,863	22.27%						
095	HALE	19,437	16,970	1,301	7.67%	29	0.17%	36	0.21%	735	4.33%	14,019	82.61%	841	4.95%	8	0.05%	6,975	41.10%						
096	HALL	2,051	1,868	6	0.32%	7	0.38%	4	0.19%	109	5.83%	1,730	92.64%	11	0.58%	1	0.06%	310	16.60%						
097	HAMILTON	5,364	5,079	26	0.51%	5	0.11%	5	0.11%	3	0.06%	5,003	98.50%	34	0.67%	2	0.04%	184	3.62%						
098	HANSFORD	3,013	2,745	38	1.37%	0	0.00%	2	0.08%	3	0.12%	2,664	97.06%	36	1.33%	1	0.04%	520	18.94%						
099	HARDEMAN	2,559	2,466	7	0.28%	3	0.14%	2	0.09%	97	3.94%	2,354	95.45%	2	0.09%	0	0.00%	245	9.94%						
100	HARDIN	34,426	32,903	12	0.04%	16	0.05%	47	0.14%	1,871	5.69%	30,841	93.73%	115	0.35%	1	0.00%	831	2.53%						
101	HARRIS	1,881,312	1,769,780	42,087	2.38%	1,474	0.08%	70,683	3.99%	414,082	23.40%	1,132,276	63.98%	108,918	6.15%	260	0.01%	336,697	19.02%						
102	HARRISON	42,207	39,076	46	0.12%	34	0.09%	65	0.17%	8,441	21.60%	30,391	77.77%	95	0.24%	4	0.01%	1,001	2.56%						
103	HARTLEY	2,734	2,557	10	0.38%	4	0.17%	2	0.08%	3	0.13%	2,533	99.08%	4	0.17%	0	0.00%	152	5.94%						
104	HASKELL	3,649	3,189	20	0.64%	15	0.47%	4	0.13%	66	2.08%	3,080	96.58%	3	0.10%	0	0.00%	449	14.08%						
105	HAYS	95,529	91,442	2,252	2.46%	75	0.08%	498	0.54%	3,167	3.46%	83,962	91.82%	1,470	1.61%	17	0.02%	18,833	20.60%						
106	HEMPHILL	2,149	2,041	5	0.27%	1	0.05%	1	0.05%	1	0.05%	2,015	98.72%	16	0.80%	1	0.05%	186	9.11%						
107	HENDERSON	47,917	45,589	116	0.25%	41	0.09%	73	0.16%	2,716	5.96%	42,257	92.69%	378	0.83%	8	0.02%	1,776	3.90%						
108	HIDALGO	287,061	242,459	39,203	16.17%	87	0.04%	1,666	0.69%	1,208	0.50%	196,165	80.91%	4,054	1.67%	77	0.03%	191,249	78.88%						
109	HILL	21,582	20,705	95	0.46%	28	0.14%	30	0.15%	1,155	5.58%	19,314	93.28%	82	0.39%	1	0.01%	1,605	7.75%						
110	HOCKLEY	13,018	11,980	556	4.64%	14	0.12%	17	0.14%	339	2.83%	11,009	91.89%	42	0.35%	3	0.03%	3,625	30.26%						
111	HOOD	33,387	32,487	61	0.19%	44	0.13%	62	0.19%	118	0.36%	31,940	98.31%	259	0.80%	4	0.01%	1,390	4.28%						
112	HOPKINS	20,419	19,409	46	0.24%	19	0.10%	36	0.19%	1,396	7.19%	17,850	91.97%	59	0.31%	2	0.01%	780	4.02%						
113	HOUSTON	13,066	12,117	17	0.14%	4	0.04%	14	0.12%	2,500	20.63%	9,490	78.32%	88	0.73%	3	0.03%	358	2.95%						
114	HOWARD	16,383	15,041	287	1.91%	27	0.18%	51	0.34%	490	3.26%	14,139	94.01%	46	0.31%	1	0.01%	5,335	33.50%						
115	HUDSPETH	1,575	1,355	61	4.54%	1	0.10%	1	0.10%	13	0.99%	1,269	93.69%	4	0.30%	4	0.30%	739	54.54%						
116	HUNT	46,487	44,761	101	0.23%	71	0.16%	141	0.32%	3,418	7.64%	40,858	91.28%	167	0.37%	4	0.01%	2,201	4.92%						
117	HUTCHINSON	13,680	12,899	33	0.25%	34	0.26%	19	0.14%	212	1.64%	12,552	97.31%	48	0.37%	1	0.01%	1,304	10.11%						
118	IRION	1,247	1,161	11	0.96%	0	0.00%	1	0.07%	7	0.57%	1,141	98.28%	1	0.10%	0	0.00%	180	15.50%						
119	JACK	4,736	4,480	9	0.19%	4	0.10%	4	0.10%	24	0.53%	4,434	98.97%	5	0.12%	0	0.00%	179	4.00%						
120	JACKSON	8,521	7,970	49	0.61%	5	0.06%	6	0.07%	526	6.60%	7,309	91.71%	76	0.95%	0	0.00%	1,516	19.02%						
121	JASPER	20,668	18,738	7	0.03%	20	0.10%	16	0.09%	2,794	14.91%	15,840	84.53%	58	0.31%	4	0.02%	398	2.12%						
122	JEFF DAVIS	1,544	1,418	20	1.41%	2	0.16%	1	0.08%	2	0.16%	1,387	97.81%	6	0.39%	0	0.00%	271	19.11%						
123	JEFFERSON	140,832	133,945	222	0.17%	86	0.06%	2,095	1.56%	46,113	34.43%	83,902	62.64%	1,511	1.13%	17	0.01%	8,472	6.32%						
124	JIM HOGG	3,696	2,948	191	6.49%	4	0.13%	0	0.00%	9	0.30%	2,628	89.16%	116	3.92%	0	0.00%	2,656	90.09%						
125	JIM WELLS	24,966	21,326	586	2.75%	13	0.06%	44	0.20%	113	0.53%	20,474	96.00%	93	0.44%	4	0.02%	15,300	71.74%						
126	JOHNSON	77,879	75,846	267	0.35%	89	0.12%	182	0.24%	1,641	2.16%	72,771	95.95%	887	1.17%	9	0.01%	6,147	8.10%						
127	JONES	9,777	9,253	152	1.64%	202	2.18%	5	0.06%	280	3.03%	8,577	92.69%	34	0.37%	3	0.04%	1,344	14.53%						
128	KARNES	7,563	6,670	95	1.42%	2	0.04%	7	0.11%	121	1.82%	6,353	95.25%	90	1.35%	1	0.02%	2,741	41.09%						
129	KAUFMAN	56,477	53,896	574	1.07%	51	0.10%	187	0.35%	5,827	10.81%	46,705	86.66%	546	1.01%	4	0.01%	3,647	6.77%						
130	KENDALL	24,502	23,719	222	0.94%	14	0.06%	77	0.33%	91	0.38%	23,192	97.78%	120	0.51%	2	0.01%	2,431	10.25%						
131	KENEDY	351	307	16	5.26%	0	0.00%	0	0.00%	0	0.00%	290	94.33%	1	0.40%	0	0.00%	203	66.12%						
132	KENT	615	565	3	0.57%	1	0.19%	0	0.00%	3	0.57%	557	98.66%	0	0.00%	0	0.00%	50	8.85%						
133	KERR	31,685	30,596	98	0.32%	38	0.12%	68	0.22%	354	1.16%	29,849	97.56%	182	0.60%	7	0.02%	3,523	11.51%						
134	KIMBLE	2,888	2,788	14	0.48%	3	0.12%	9	0.32%	6	0.20%	2,746	98.51%	10	0.36%	0	0.00%	346	12.41%						
135	KING	187	171	0	0.00%	1	0.64%	0	0.00%	0	0.00%	169	98.72%	1	0.64%	0	0.00%	11	6.43%						
136	KINNEY	2,308	2,028	97	4.76%	4	0.17%	2	0.12%	35	1.74%	1,874	92.39%	14	0.70%	2	0.12%	741	36.54%						
137	KLEBERG	17,106	15,567	914	5.87%	12	0.08%	101	0.65%	550	3.53%	13,900	89.29%	88	0.56%	2	0.02%	9,489	60.96%						
138	KNOX	2,253	2,102	6	0.28%	6	0.28%	4	0.17%	92	4.37%	1,991	94.73%	4	0.17%	0	0.00%	433	20.60%						
139	LAMAR	28,064	26,151	11	0.04%	99	0.38%	95	0.36%	2,994	11.45%	22,797	87.17%	148	0.57%	7	0.03%	448	1.71%						
140	LAMB	8,305	7,269	204	2.81%	12	0.16%	4	0.05%	312	4.30%	6,622	91.10%	115	1.58%	0	0.00%	2,628	36.15%						
141	LAMPASAS	12,449	11,963	77	0.65%	18	0.15%	80	0.67%	396	3.31%	11,217	93.77%	173	1.45%	1	0.01%	1,128	9.43%						
142	LA SALLE	3,868	2,935	377	12.84%	0	0.00%	1	0.04%	7	0.22%	2,501	85.21%	48	1.64%	1	0.04%	2,195	74.79%						
143	LAVACA	12,926																							

EXHIBIT A

County CodeCounty NameVR			A		B		E																		F	
							Hispanic (tracked since 2009)		American Indian/Alaskan Native		Asian/Pacific Islander		Black		White		Other		No Ethnicity		Total SOS Spanish					
							DPS ETHNICITY		DPS ETHNICITY		DPS ETHNICITY		DPS ETHNICITY		DPS ETHNICITY		DPS ETHNICITY		DPS ETHNICITY		DPS ETHNICITY					
							Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%		
175	NAVARRO	26,494	25,070	219	0.87%	22	0.09%	53	0.21%	3,574	14.25%	21,051	83.97%	145	0.58%	7	0.03%	2,057	8.21%							
176	NEWTON	8,688	7,656	2	0.03%	4	0.06%	4	0.06%	1,257	16.42%	6,368	83.18%	13	0.17%	7	0.09%	118	1.54%							
177	NOLAN	8,411	8,188	333	4.07%	42	0.51%	9	0.11%	292	3.57%	7,402	90.40%	108	1.31%	1	0.01%	1,930	23.57%							
178	NUECES	183,144	166,282	9,410	5.66%	148	0.09%	1,456	0.88%	6,811	4.10%	147,052	88.44%	1,386	0.83%	19	0.01%	79,239	47.65%							
179	OCHILTREE	4,936	4,523	99	2.19%	7	0.15%	8	0.17%	8	0.17%	4,348	96.12%	53	1.17%	1	0.02%	859	18.99%							
180	OLDHAM	1,356	1,276	6	0.50%	3	0.25%	3	0.25%	4	0.33%	1,254	98.26%	5	0.41%	0	0.00%	100	7.84%							
181	ORANGE	47,690	45,645	17	0.04%	45	0.10%	152	0.33%	3,245	7.11%	41,991	92.00%	190	0.42%	3	0.01%	1,452	3.18%							
182	PALO PINTO	16,720	15,947	46	0.29%	5	0.03%	24	0.15%	358	2.24%	15,372	96.40%	141	0.89%	0	0.00%	1,243	7.79%							
183	PANOLA	15,258	14,570	11	0.08%	11	0.08%	21	0.15%	2,205	15.14%	12,296	84.39%	23	0.15%	2	0.02%	328	2.25%							
184	PARKER	72,457	70,576	148	0.21%	94	0.13%	157	0.22%	552	0.78%	69,276	98.16%	340	0.48%	11	0.02%	3,052	4.32%							
185	PARMER	4,424	3,724	66	1.77%	1	0.03%	4	0.12%	29	0.77%	3,550	95.34%	73	1.95%	1	0.03%	1,192	32.01%							
186	PECOS	7,883	7,131	178	2.50%	8	0.11%	10	0.15%	64	0.89%	6,851	96.08%	19	0.26%	1	0.02%	4,058	56.91%							
187	POLK	35,799	33,084	66	0.20%	254	0.77%	52	0.16%	2,058	6.22%	30,420	91.95%	231	0.70%	3	0.01%	1,238	3.74%							
188	POTTER	49,943	47,860	395	0.83%	71	0.15%	467	0.98%	3,619	7.56%	43,134	90.12%	171	0.36%	3	0.01%	9,156	19.13%							
189	PRESIDIO	5,079	3,421	248	7.25%	1	0.03%	4	0.10%	8	0.24%	2,864	83.71%	292	8.53%	5	0.14%	2,304	67.35%							
190	RAINS	6,524	6,241	5	0.09%	12	0.19%	13	0.21%	146	2.34%	6,055	97.02%	10	0.16%	0	0.00%	179	2.87%							
191	RANDALL	75,599	73,409	220	0.30%	87	0.12%	313	0.43%	1,120	1.53%	71,482	97.37%	182	0.25%	4	0.01%	6,901	9.40%							
192	REAGAN	1,744	1,596	87	5.45%	4	0.23%	1	0.08%	31	1.97%	1,465	91.82%	7	0.45%	0	0.00%	637	39.91%							
193	REAL	2,410	2,232	76	3.39%	1	0.05%	1	0.05%	5	0.25%	2,141	95.92%	8	0.34%	0	0.00%	350	15.68%							
194	RED RIVER	7,455	6,848	2	0.03%	14	0.21%	3	0.05%	1,025	14.96%	5,772	84.29%	31	0.45%	1	0.02%	150	2.19%							
195	REEVES	6,056	5,226	184	3.52%	7	0.14%	12	0.23%	104	1.99%	4,899	93.75%	18	0.34%	2	0.05%	3,791	72.54%							
196	REFUGIO	5,065	4,595	105	2.30%	3	0.08%	3	0.08%	276	6.00%	4,150	90.32%	57	1.24%	0	0.00%	1,781	38.76%							
197	ROBERTS	680	629	1	0.18%	1	0.18%	0	0.00%	0	0.00%	623	99.12%	3	0.53%	0	0.00%	19	3.02%							
198	ROBERTSON	10,932	9,846	61	0.62%	7	0.07%	30	0.30%	2,179	22.13%	7,516	76.34%	49	0.50%	4	0.05%	1,005	10.21%							
199	ROCKWALL	45,205	44,003	165	0.37%	40	0.09%	463	1.05%	2,286	5.20%	40,868	92.88%	176	0.40%	4	0.01%	2,859	6.50%							
200	RUNNELS	6,622	6,486	123	1.90%	21	0.32%	12	0.18%	78	1.20%	6,233	96.10%	19	0.29%	1	0.02%	1,450	22.36%							
201	RUSSK	29,831	27,246	37	0.14%	23	0.08%	51	0.19%	4,047	14.85%	22,991	84.38%	90	0.33%	7	0.02%	1,066	3.91%							
202	SABINE	7,271	6,647	1	0.02%	5	0.08%	5	0.08%	389	5.86%	6,230	93.73%	13	0.20%	2	0.03%	97	1.46%							
203	SAN AUGUSTINE	5,899	4,999	0	0.00%	2	0.04%	4	0.09%	1,057	21.14%	3,928	78.58%	8	0.15%	0	0.00%	97	1.94%							
204	SAN JACINTO	15,436	14,656	39	0.27%	15	0.10%	24	0.16%	1,512	10.32%	13,000	88.70%	65	0.44%	0	0.00%	582	3.97%							
205	SAN PATRICIO	41,507	36,870	1,829	4.96%	43	0.12%	187	0.51%	689	1.87%	33,870	91.86%	243	0.66%	8	0.02%	16,042	43.51%							
206	SAN SABA	3,677	3,366	20	0.59%	1	0.03%	6	0.16%	9	0.26%	3,263	96.93%	66	1.96%	2	0.07%	452	13.43%							
207	SCHLEICHER	1,765	1,606	20	1.23%	0	0.00%	1	0.07%	17	1.08%	1,563	97.33%	5	0.29%	0	0.00%	501	31.20%							
208	SCURRY	9,110	8,483	402	4.74%	23	0.27%	8	0.10%	221	2.60%	7,726	91.07%	103	1.21%	0	0.00%	1,985	23.40%							
209	SHACKELFORD	2,251	2,063	7	0.33%	7	0.33%	1	0.05%	8	0.38%	2,028	98.31%	11	0.55%	1	0.05%	122	5.91%							
210	SHELBY	13,663	12,560	35	0.12%	5	0.04%	21	0.17%	1,948	15.51%	10,476	83.41%	88	0.70%	6	0.05%	363	2.89%							
211	SHERMAN	1,416	1,248	11	0.88%	0	0.00%	1	0.09%	3	0.26%	1,227	98.33%	3	0.26%	2	0.18%	233	18.67%							
212	SMITH	117,670	113,233	241	0.21%	113	0.10%	472	0.42%	19,349	17.09%	92,170	81.40%	879	0.78%	9	0.01%	5,725	5.06%							
213	SOMERVELL	5,466	5,165	14	0.27%	14	0.27%	10	0.19%	8	0.15%	5,052	97.81%	65	1.27%	2	0.04%	397	7.69%							
214	STARR	29,326	23,180	1,610	6.95%	1	0.01%	32	0.14%	26	0.11%	20,164	86.99%	1,332	5.74%	15	0.06%	22,069	95.21%							
215	STEPHENS	5,539	5,097	56	1.11%	12	0.23%	4	0.09%	63	1.23%	4,894	96.02%	67	1.32%	0	0.00%	483	9.48%							
216	STERLING	827	746	7	0.88%	0	0.00%	0	0.00%	1	0.15%	735	98.53%	3	0.44%	0	0.00%	154	20.64%							
217	STONEWALL	1,063	1,004	6	0.59%	2	0.24%	0	0.00%	22	2.23%	971	96.71%	2	0.24%	0	0.00%	87	8.67%							
218	SUTTON	2,434	2,138	25	1.18%	1	0.05%	2	0.11%	1	0.05%	2,092	97.86%	15	0.69%	1	0.05%	912	42.66%							
219	SWISHER	4,111	3,958	168	4.25%	2	0.06%	1	0.03%	141	3.56%	3,504	88.53%	140	3.53%	1	0.03%	1,080	27.29%							
220	TARRANT	912,896	879,260	8,142	0.93%	1,229	0.14%	19,380	2.20%	136,504	15.52%	709,030	80.64%	4,836	0.55%	139	0.02%	99,143	11.28%							
221	TAYLOR	72,067	68,863	986	1.43%	1,794	2.60%	500	0.73%	3,702	5.38%	61,587	89.43%	290	0.42%	4	0.01%	8,773	12.74%							
222	TERRELL	889	790	14	1.71%	2	0.28%	2	0.28%	1	0.14%	771	97.58%	0	0.00%	0	0.00%	278	35.19%							
223	TERRY	7,161	6,495	549	8.45%	7	0.11%	5	0.07%	191	2.94%	5,625	86.61%	112	1.73%	5	0.07%	2,515	38.72%							
224	THROCKMORTON	1,215	1,104	9	0.77%	1	0.10%	0	0.00%	0	0.00%	1,091	98.84%	3	0.29%	0	0.00%	60	5.43%							
225	TITUS	15,328	14,430	47	0.33%	26	0.18%	49	0.34%	1,824	12.64%	12,041	83.44%	436	3.02%	7	0.05%	1,744	12.09%							
226	TOM GREEN	59,037	56,243	432	0.77%	76	0.13%	325	0.58%	1,831	3.26%	53,298	94.76%	279	0.50%	2	0.00%	12,851	22.85%							
227	TRAVIS	584,466	552,699	10,336	1.87%	621	0.11%	15,028	2.72%	47,906	8.67%	471,245	85.26%	7,492	1.36%	71	0.01%	81,348	14.72%							
228	TRINITY	11,392	10,039	14	0.14%	5	0.05%	12	0.12%	879	8.75%	9,075	90.40%	53	0.52%	1	0.01%	277	2.76%							
229	TYLER	12,512	11,549	4	0.04%	8	0.07%	8	0.07%	802	6.94%	10,677	92.45%	48	0.41%	2	0.02%	181	1.57%							
230	UPSHUR	25,769	23,798	21	0.09%	34	0.14%	29	0.12%	1,996	8.39%	21,639	90.93%	77	0.32%	2	0.01%	530	2.23%							
231	UPTON	2,133	1,954	91	4.66%	2	0.12%	1	0.06%	33	1.71%	1,818	93.04%	7	0.35%	1	0.06%	655	33.52%							
232	UVALDE	15,752	13,758	2,009	14.60%	14	0.																			

EXHIBIT B

EXHIBIT B			C		D														G			
					Voters with DPS Match																	
					Hispanic (tracked since 2009)		American Indian/Alaskan		Asian/Pacific Islander		Black		White		Other		No Ethnicity				Total SOS Spanish	
County Code	County Name	VR	Total Matches	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%			
001	ANDERSON	25,810	22,159	94	0.42%	20	0.09%	61	0.28%	2,840	12.82%	18,928	85.42%	213	0.96%	3	0.01%	946	4.27%			
002	ANDREWS	7,958	6,466	432	6.68%	13	0.20%	16	0.25%	104	1.61%	5,882	90.97%	18	0.28%	1	0.02%	1,847	28.56%			
003	ANGELINA	47,132	39,717	130	0.33%	39	0.10%	106	0.27%	5,422	13.65%	33,697	84.84%	318	0.80%	5	0.01%	2,502	6.30%			
004	ARANSAS	14,943	13,123	161	1.23%	23	0.18%	132	1.01%	108	0.82%	12,641	96.33%	57	0.43%	1	0.01%	1,637	12.47%			
005	ARCHER	6,186	5,564	6	0.11%	8	0.14%	12	0.22%	15	0.27%	5,514	99.10%	8	0.14%	1	0.02%	103	1.85%			
006	ARMSTRONG	1,404	1,176	1	0.09%	3	0.26%	0	0.00%	3	0.26%	1,166	99.15%	3	0.26%	0	0.00%	29	2.47%			
007	ATASCOSA	23,266	17,727	958	5.40%	20	0.11%	23	0.13%	89	0.50%	16,080	90.71%	556	3.14%	1	0.01%	7,954	44.87%			
008	AUSTIN	17,522	15,403	118	0.77%	10	0.06%	41	0.27%	1,309	8.50%	13,459	87.38%	464	3.01%	2	0.01%	1,225	7.95%			
009	BAILEY	3,381	2,517	93	3.69%	5	0.20%	5	0.20%	31	1.23%	2,371	94.20%	10	0.40%	2	0.08%	783	31.11%			
010	BANDERA	14,214	12,577	87	0.69%	16	0.13%	30	0.24%	35	0.28%	12,357	98.25%	49	0.39%	3	0.02%	1,133	9.01%			
011	BASTROP	39,058	33,624	281	0.84%	34	0.10%	85	0.25%	2,529	7.52%	30,279	90.05%	411	1.22%	5	0.01%	3,820	11.36%			
012	BAYLOR	2,526	2,086	4	0.19%	1	0.05%	2	0.10%	33	1.58%	2,042	97.89%	4	0.19%	0	0.00%	132	6.33%			
013	BEE	14,365	10,916	170	1.56%	10	0.09%	25	0.23%	184	1.69%	10,022	91.81%	505	4.63%	0	0.00%	5,258	48.17%			
014	BELL	149,320	125,110	1,421	1.14%	256	0.20%	2,375	1.90%	26,528	21.20%	89,702	71.70%	4,802	3.84%	26	0.02%	12,327	9.85%			
015	BEXAR	863,645	671,995	28,307	4.21%	613	0.09%	9,032	1.34%	54,881	8.17%	560,228	83.37%	18,846	2.80%	88	0.01%	256,632	38.19%			
016	BLANCO	6,911	6,163	27	0.44%	3	0.05%	13	0.21%	45	0.73%	6,053	98.22%	20	0.32%	2	0.03%	440	7.14%			
017	BORDEN	435	380	0	0.00%	0	0.00%	1	0.26%	0	0.00%	378	99.47%	1	0.26%	0	0.00%	16	4.21%			
018	BOSQUE	11,608	10,255	50	0.49%	4	0.04%	7	0.07%	149	1.45%	10,010	97.61%	34	0.33%	1	0.01%	534	5.21%			
019	BOWIE	54,818	48,197	25	0.05%	50	0.10%	114	0.24%	9,140	18.96%	38,613	80.11%	244	0.51%	11	0.02%	689	1.43%			
020	BRAZORIA	168,520	144,733	1,768	1.22%	118	0.08%	3,833	2.65%	16,948	11.71%	116,856	80.74%	5,194	3.59%	16	0.01%	18,992	13.12%			
021	BRAZOS	85,356	74,151	676	0.91%	55	0.07%	886	1.19%	7,592	10.24%	64,359	86.79%	574	0.77%	9	0.01%	7,068	9.53%			
022	BREWSTER	6,390	5,034	143	2.84%	5	0.10%	14	0.28%	58	1.15%	4,775	94.85%	35	0.70%	4	0.08%	1,307	25.96%			
023	BRISCOE	1,140	892	16	1.79%	1	0.11%	0	0.00%	15	1.68%	846	94.84%	13	1.46%	1	0.11%	91	10.20%			
024	BROOKS	6,607	3,363	226	6.72%	1	0.03%	3	0.09%	9	0.27%	3,092	91.94%	30	0.89%	2	0.06%	2,953	87.81%			
025	BROWN	21,735	18,931	39	0.21%	18	0.10%	36	0.19%	532	2.81%	18,236	96.33%	68	0.36%	2	0.01%	1,561	8.25%			
026	BURLESON	10,548	8,902	68	0.76%	3	0.03%	13	0.15%	947	10.64%	7,751	87.07%	118	1.33%	2	0.02%	674	7.57%			
027	BURNET	25,484	22,934	55	0.24%	16	0.07%	53	0.23%	222	0.97%	22,515	98.17%	69	0.30%	4	0.02%	1,474	6.43%			
028	CALDWELL	19,637	15,402	540	3.51%	15	0.10%	31	0.20%	1,091	7.08%	13,429	87.19%	290	1.88%	6	0.04%	4,025	26.13%			
029	CALHOUN	12,121	9,620	70	0.73%	4	0.04%	166	1.73%	281	2.92%	8,780	91.27%	319	3.32%	0	0.00%	2,745	28.53%			
030	CALLAHAN	8,585	7,520	23	0.31%	51	0.68%	12	0.16%	47	0.63%	7,366	97.95%	20	0.27%	1	0.01%	286	3.80%			
031	CAMERON	170,543	108,159	10,572	9.77%	40	0.04%	414	0.38%	467	0.43%	95,089	87.92%	1,536	1.42%	41	0.04%	75,714	70.00%			
032	CAMP	6,938	5,889	12	0.20%	12	0.20%	18	0.31%	1,080	18.34%	4,702	79.84%	63	1.07%	2	0.03%	242	4.11%			
033	CARSON	4,217	3,680	6	0.16%	3	0.08%	2	0.05%	8	0.22%	3,651	99.21%	10	0.27%	0	0.00%	145	3.94%			
034	CASS	17,924	15,140	3	0.02%	10	0.07%	8	0.05%	2,192	14.48%	12,861	84.95%	64	0.42%	2	0.01%	172	1.14%			
035	CASTRO	4,077	2,919	225	7.71%	6	0.21%	5	0.17%	46	1.58%	2,459	84.24%	177	6.06%	1	0.03%	906	31.04%			
036	CHAMBERS	23,277	19,960	82	0.41%	17	0.09%	106	0.53%	1,714	8.59%	17,773	89.04%	265	1.33%	3	0.02%	1,381	6.92%			
037	CHEROKEE	26,342	23,071	30	0.13%	22	0.10%	47	0.20%	3,007	13.03%	19,844	86.01%	120	0.52%	1	0.00%	1,043	4.52%			
038	CHILDRESS	3,526	2,902	14	0.48%	6	0.21%	5	0.17%	111	3.82%	2,750	94.76%	15	0.52%	1	0.03%	273	9.41%			
039	CLAY	7,592	6,804	7	0.10%	11	0.16%	7	0.10%	15	0.22%	6,750	99.21%	12	0.18%	2	0.03%	135	1.98%			
040	COCHRAN	1,757	1,325	89	6.72%	1	0.08%	0	0.00%	59	4.45%	1,171	88.38%	5	0.38%	0	0.00%	424	32.00%			
041	COKE	2,346	1,937	8	0.41%	1	0.05%	0	0.00%	2	0.10%	1,920	99.12%	6	0.31%	0	0.00%	183	9.45%			
042	COLEMAN	6,006	5,227	35	0.67%	8	0.15%	6	0.11%	84	1.61%	5,083	97.25%	10	0.19%	1	0.02%	451	8.63%			
043	COLLIN	427,811	375,099	1,229	0.33%	576	0.15%	14,569	3.88%	30,628	8.15%	325,817	86.67%	3,045	0.81%	45	0.01%	19,432	5.17%			
044	COLLINGSWORTH	1,847	1,500	11	0.73%	5	0.33%	0	0.00%	54	3.60%	1,421	94.73%	9	0.60%	0	0.00%	143	9.53%			
045	COLORADO	13,003	10,971	41	0.37%	5	0.05%	12	0.11%	1,334	12.16%	9,363	85.34%	214	1.95%	2	0.02%	1,176	10.72%			
046	COMAL	73,754	64,729	636	0.98%	65	0.10%	286	0.44%	880	1.36%	61,854	95.56%	1,002	1.55%	6	0.01%	7,959	12.30%			
047	COMANCHE	8,862	7,302	42	0.58%	6	0.08%	10	0.14%	10	0.14%	7,068	96.80%	165	2.26%	1	0.01%	654	8.96%			
048	CONCHO	1,664	1,382	17	1.23%	0	0.00%	2	0.14%	8	0.58%	1,351	97.76%	4	0.29%	0	0.00%	267	19.32%			
049	COOKE	22,736	20,279	105	0.52%	30	0.15%	65	0.32%	483	2.38%	19,549	96.40%	43	0.21%	4	0.02%	763	3.76%			
050	CORYELL	33,662	28,263	106	0.38%	75	0.27%	406	1.44%	3,771	13.34%	23,062	81.60%	839	2.97%	4	0.01%	2,129	7.53%			
051	COTTLE	1,124	875	5	0.57%	3	0.34%	0	0.00%	71	8.11%	792	90.51%	4	0.46%	0	0.00%	76	8.69%			
052	CRANE	2,366	1,905	147	7.72%	1	0.05%	5	0.26%	55	2.89%	1,696	89.03%	1	0.05%	0	0.00%	648	34.02%			
053	CROCKETT	2,524	1,870	42	2.25%	1	0.05%	4	0.21%	5	0.27%	1,812	96.90%	5	0.27%	1	0.05%	834	44.60%			
054	CROSBY	3,618	2,542	65	2.56%	3	0.12%	2	0.08%	79	3.11%	2,369	93.19%	23	0.90%	1	0.04%	884	34.78%			
055	CULBERSON	1,721	1,154	79	6.85%	3	0.26%	4	0.35%	7	0.61%	1,056	91.51%	5	0.43%	0	0.00%	727	63.00%			
056	DALLAM	2,923	2,414	31	1.28%	4	0.17%	6	0.25%	35	1.45%	2,331	96.56%	7	0.29%	0	0.00%	447	18.52%			
057	DALLAS	1,103,074	882,428	15,551	1.76%	1,118	0.13%	21,10														

EXHIBIT B

A			C	D														G			
				Voters with DPS Match																	
				Hispanic (tracked since 2009)		American Indian/Alaskan		Asian/Pacific Islander		Black		White		Other		No Ethnicity					
				DPS Ethnicity		DPS Ethnicity		DPS Ethnicity		DPS Ethnicity		DPS Ethnicity		DPS Ethnicity		DPS No Ethnicity					
County Code	County Name	VR	Total Matches	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%		
096	HALL	2,051	1,562	5	0.32%	6	0.38%	3	0.19%	91	5.83%	1,447	92.64%	9	0.58%	1	0.06%	178	11.40%		
097	HAMILTON	5,364	4,747	24	0.51%	5	0.11%	5	0.11%	3	0.06%	4,676	98.50%	32	0.67%	2	0.04%	139	2.93%		
098	HANSFORD	3,013	2,415	33	1.37%	0	0.00%	2	0.08%	3	0.12%	2,344	97.06%	32	1.33%	1	0.04%	351	14.53%		
099	HARDEMAN	2,559	2,155	6	0.28%	3	0.14%	2	0.09%	85	3.94%	2,057	97.95%	2	0.09%	0	0.00%	166	7.70%		
100	HARDIN	34,426	30,270	11	0.04%	15	0.05%	43	0.14%	1,721	5.69%	28,373	93.73%	106	0.35%	1	0.00%	685	2.26%		
101	HARRIS	1,881,312	1,522,509	36,207	2.38%	1,268	0.08%	60,807	3.99%	356,227	23.40%	974,076	63.98%	93,700	6.15%	224	0.01%	243,123	15.97%		
102	HARRISON	42,207	35,508	42	0.12%	31	0.09%	59	0.17%	7,670	21.60%	27,616	77.77%	86	0.24%	4	0.01%	751	2.12%		
103	HARTLEY	2,734	2,384	9	0.38%	4	0.17%	2	0.08%	3	0.13%	2,362	99.08%	4	0.17%	0	0.00%	121	5.08%		
104	HASKELL	3,649	2,986	19	0.64%	14	0.47%	4	0.13%	62	2.08%	2,884	96.58%	3	0.10%	0	0.00%	350	11.72%		
105	HAYS	95,529	81,324	2,003	2.46%	67	0.08%	443	0.54%	2,817	3.46%	74,672	91.82%	1,307	1.61%	15	0.02%	14,073	17.30%		
106	HEMPHILL	2,149	1,880	5	0.27%	1	0.05%	1	0.05%	1	0.05%	1,856	98.72%	15	0.80%	1	0.05%	121	6.44%		
107	HENDERSON	47,917	41,599	106	0.25%	37	0.09%	67	0.16%	2,478	5.96%	38,559	92.69%	345	0.83%	7	0.02%	1,333	3.20%		
108	HIDALGO	287,061	170,612	27,586	16.17%	61	0.04%	1,172	0.69%	850	0.50%	138,036	80.91%	2,853	1.67%	54	0.03%	128,558	75.35%		
109	HILL	21,582	19,048	87	0.46%	26	0.14%	28	0.15%	1,063	5.58%	17,768	93.28%	75	0.39%	1	0.01%	1,209	6.35%		
110	HOCKLEY	13,018	10,388	482	4.64%	12	0.12%	15	0.14%	294	2.83%	9,546	91.89%	36	0.35%	3	0.03%	2,611	25.13%		
111	HOOD	33,387	30,502	57	0.19%	41	0.13%	58	0.19%	111	0.36%	29,988	98.31%	243	0.80%	4	0.01%	1,106	3.63%		
112	HOPKINS	20,419	17,667	42	0.24%	17	0.10%	33	0.19%	1,271	7.19%	16,248	91.97%	54	0.31%	2	0.01%	511	2.89%		
113	HOUSTON	13,066	11,091	16	0.14%	4	0.04%	13	0.12%	2,288	20.63%	8,686	78.32%	81	0.73%	3	0.03%	274	2.47%		
114	HOWARD	16,383	13,380	255	1.91%	24	0.18%	45	0.34%	436	3.26%	12,578	94.01%	41	0.31%	1	0.01%	2,605	19.47%		
115	HUDSPETH	1,575	1,014	46	4.54%	1	0.10%	1	0.10%	10	0.99%	950	93.69%	3	0.30%	3	0.30%	466	45.96%		
116	HUNT	46,487	41,528	94	0.23%	66	0.16%	131	0.32%	3,171	7.64%	37,907	91.28%	155	0.37%	4	0.01%	1,651	3.98%		
117	HUTCHINSON	13,680	11,799	30	0.25%	31	0.26%	17	0.14%	194	1.64%	11,482	97.31%	44	0.37%	1	0.01%	972	8.24%		
118	IRION	1,247	1,045	10	0.96%	0	0.00%	1	0.10%	6	0.57%	1,027	98.28%	1	0.10%	0	0.00%	151	14.45%		
119	JACK	4,736	4,183	8	0.19%	4	0.10%	4	0.10%	22	0.53%	4,140	98.97%	5	0.12%	0	0.00%	123	2.94%		
120	JACKSON	8,521	7,030	43	0.61%	4	0.06%	5	0.07%	464	6.60%	6,447	91.71%	67	0.95%	0	0.00%	1,136	16.16%		
121	JASPER	20,868	17,225	6	0.03%	18	0.10%	15	0.09%	2,568	14.91%	14,561	84.53%	53	0.31%	4	0.02%	299	1.74%		
122	JEFF DAVIS	1,544	1,276	18	1.41%	2	0.16%	1	0.08%	2	0.16%	1,248	97.81%	5	0.39%	0	0.00%	212	16.61%		
123	JEFFERSON	140,832	116,605	193	0.17%	75	0.06%	1,824	1.56%	40,143	34.43%	73,040	62.64%	1,315	1.13%	15	0.01%	6,481	5.56%		
124	JIM HOGG	3,696	2,297	149	6.49%	3	0.13%	0	0.00%	7	0.30%	2,048	89.16%	90	3.92%	0	0.00%	2,053	89.38%		
125	JIM WELLS	24,966	16,663	458	2.75%	10	0.06%	34	0.20%	88	0.53%	15,997	96.00%	73	0.44%	3	0.02%	11,199	67.21%		
126	JOHNSON	77,879	69,687	245	0.35%	82	0.12%	167	0.24%	1,508	2.16%	66,862	95.95%	815	1.17%	8	0.01%	4,524	6.49%		
127	JONES	9,777	8,428	138	1.64%	184	2.18%	5	0.06%	255	3.03%	7,812	92.69%	31	0.37%	3	0.04%	980	11.63%		
128	KARNES	7,563	5,556	79	1.42%	2	0.04%	6	0.11%	101	1.82%	5,292	95.25%	75	1.35%	1	0.02%	1,933	34.79%		
129	KAUFMAN	56,477	48,327	515	1.07%	46	0.10%	168	0.35%	5,225	10.81%	41,879	86.66%	490	1.01%	4	0.01%	2,638	5.46%		
130	KENDALL	24,502	22,081	207	0.94%	13	0.06%	72	0.33%	85	0.38%	21,590	97.78%	112	0.51%	2	0.01%	1,937	8.77%		
131	KENEDY	351	247	13	5.26%	0	0.00%	0	0.00%	0	0.00%	233	94.33%	1	0.40%	0	0.00%	150	60.73%		
132	KENT	615	524	3	0.57%	1	0.19%	0	0.00%	3	0.57%	517	98.66%	0	0.00%	0	0.00%	39	7.44%		
133	KERR	31,685	27,497	88	0.32%	34	0.12%	61	0.22%	318	1.16%	26,826	97.56%	164	0.60%	6	0.02%	2,742	9.97%		
134	KIMBLE	2,888	2,477	12	0.48%	3	0.12%	8	0.32%	5	0.20%	2,440	98.51%	9	0.36%	0	0.00%	240	9.69%		
135	KING	187	156	0	0.00%	1	0.64%	0	0.00%	0	0.00%	154	98.72%	1	0.64%	0	0.00%	5	3.21%		
136	KINNEY	2,308	1,722	82	4.76%	3	0.17%	2	0.12%	30	1.74%	1,591	92.39%	12	0.70%	2	0.12%	514	29.85%		
137	KLEBERG	17,106	12,626	741	5.87%	10	0.08%	82	0.65%	446	3.53%	11,274	89.29%	71	0.56%	2	0.02%	7,022	55.62%		
138	KNOX	2,253	1,783	5	0.28%	5	0.28%	3	0.17%	78	4.37%	1,689	94.73%	3	0.17%	0	0.00%	298	16.71%		
139	LAMAR	28,064	23,968	10	0.04%	91	0.38%	87	0.36%	2,744	11.45%	20,894	87.17%	136	0.57%	6	0.03%	352	1.47%		
140	LAMB	8,305	6,189	174	2.81%	10	0.16%	3	0.05%	266	4.30%	5,638	91.10%	98	1.58%	0	0.00%	1,867	30.17%		
141	LAMPASAS	12,449	11,003	71	0.65%	17	0.15%	74	0.67%	364	3.31%	10,317	93.77%	159	1.45%	1	0.01%	866	7.87%		
142	LA SALLE	3,868	2,251	289	12.84%	0	0.00%	1	0.04%	5	0.22%	1,918	85.21%	37	1.64%	1	0.04%	1,616	71.79%		
143	LAVACA	12,926	11,312	15	0.13%	8	0.07%	11	0.10%	522	4.61%	10,681	94.42%	74	0.65%	1	0.01%	774	6.84%		
144	LEE	9,232	8,029	41	0.51%	4	0.05%	10	0.12%	784	9.76%	7,095	88.37%	93	1.16%	2	0.02%	552	6.88%		
145	LEON	10,505	9,214	7	0.08%	10	0.11%	20	0.22%	622	6.75%	8,508	92.34%	45	0.49%	2	0.02%	315	3.42%		
146	LIBERTY	41,923	35,403	179	0.51%	46	0.13%	85	0.24%	3,779	10.67%	31,173	88.05%	138	0.39%	3	0.01%	1,777	5.02%		
147	LIMESTONE	13,132	11,062	27	0.24%	5	0.05%	19	0.17%	1,782	16.11%	9,198	83.15%	25	0.23%	6	0.05%	546	4.94%		
148	LIPSOMB	1,852	1,612	15	0.93%	7	0.43%	2	0.12%	0	0.00%	1,581	98.08%	7	0.43%	0	0.00%	129	8.00%		
149	LIVE OAK	6,956	5,563	37	0.67%	3	0.05%	9	0.16%	14	0.25%	5,457	98.09%	43	0.77%	0	0.00%	1,356	24.38%		
150	LLANO	13,743	12,447	13	0.10%	11	0.09%	22	0.18%	44	0.35%	12,342	99.16%	14	0.11%	1	0.01%	319	2.56%		
151	LOVING	122	91	0	0.00%	0	0.00%	0	0.00%	0	0.00%	91	100.00%	0	0.00%	0	0.00%	13	14.29%		
152	LUBBOCK	148,353	124,479	3,165	2.54%	129	0.10%	866	0.70%	7,504	6.03%	112,254	90.18%	546	0.44%	15					

EXHIBIT B

			C		D														G	
					Voters with DPS Match															
					Hispanic (tracked since 2009)		American Indian/Alaskan		Asian/Pacific Islander		Black		White		Other		No Ethnicity		Total SOS Spanish	
					DPS Ethnicity		DPS Ethnicity		DPS Ethnicity		DPS Ethnicity		DPS Ethnicity		DPS Ethnicity		DPS No Ethnicity			
County Code	County Name	VR	Total Matches		Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%	Total	%
191	RANDALL	75,599	68,145		204	0.30%	81	0.12%	291	0.43%	1,040	1.53%	66,356	97.37%	169	0.25%	4	0.01%	5,387	7.91%
192	REAGAN	1,744	1,320		72	5.45%	3	0.23%	1	0.08%	26	1.97%	1,212	91.82%	6	0.45%	0	0.00%	445	33.71%
193	REAL	2,410	2,033		69	3.39%	1	0.05%	1	0.05%	5	0.25%	1,950	95.92%	7	0.34%	0	0.00%	282	13.87%
194	RED RIVER	7,455	6,276		2	0.03%	13	0.21%	3	0.05%	939	14.96%	5,290	84.29%	28	0.45%	1	0.02%	117	1.86%
195	REEVES	6,056	4,430		156	3.52%	6	0.14%	10	0.23%	88	1.99%	4,153	93.75%	15	0.34%	2	0.05%	3,118	70.38%
196	REFUGIO	5,065	3,965		91	2.30%	3	0.08%	3	0.08%	238	6.00%	3,581	90.32%	49	1.24%	0	0.00%	1,369	34.53%
197	ROBERTS	680	569		1	0.18%	1	0.18%	0	0.00%	0	0.00%	564	99.12%	3	0.53%	0	0.00%	10	1.76%
198	ROBERTSON	10,932	8,858		55	0.62%	6	0.07%	27	0.30%	1,960	22.13%	6,762	76.34%	44	0.50%	4	0.05%	754	8.51%
199	ROCKWALL	45,205	40,287		151	0.37%	37	0.09%	424	1.05%	2,093	5.20%	37,417	92.88%	161	0.40%	4	0.01%	2,183	5.42%
200	RUNNELS	6,622	5,587		106	1.90%	18	0.32%	10	0.18%	67	1.20%	5,369	96.10%	16	0.29%	1	0.02%	1,033	18.49%
201	RUSK	29,831	25,084		34	0.14%	21	0.08%	47	0.19%	3,726	14.85%	21,167	84.38%	83	0.33%	6	0.02%	776	3.09%
202	SABINE	7,271	6,080		1	0.02%	5	0.08%	5	0.08%	356	5.86%	5,699	93.73%	12	0.20%	2	0.03%	82	1.35%
203	SAN AUGUSTINE	5,899	4,575		0	0.00%	2	0.04%	4	0.09%	967	21.14%	3,595	78.58%	7	0.15%	0	0.00%	67	1.46%
204	SAN JACINTO	15,436	13,393		36	0.27%	14	0.10%	22	0.16%	1,382	10.32%	11,880	88.70%	59	0.44%	0	0.00%	443	3.31%
205	SAN PATRICIO	41,507	30,749		1,525	4.96%	36	0.12%	156	0.51%	575	1.87%	28,247	91.86%	203	0.66%	7	0.02%	11,660	37.92%
206	SAN SABA	3,677	3,060		18	0.59%	1	0.03%	5	0.16%	8	0.26%	2,966	96.93%	60	1.96%	2	0.07%	338	11.05%
207	SCHLEICHER	1,765	1,386		17	1.23%	0	0.00%	1	0.07%	15	1.08%	1,349	97.33%	4	0.29%	0	0.00%	371	26.77%
208	SCURRY	9,110	7,337		348	4.74%	20	0.27%	7	0.10%	191	2.60%	6,682	91.07%	89	1.21%	0	0.00%	1,415	19.29%
209	SHACKELFORD	2,251	1,834		6	0.33%	6	0.33%	1	0.05%	7	0.38%	1,803	98.31%	10	0.55%	1	0.05%	82	4.47%
210	SHELBY	13,663	10,646		13	0.12%	4	0.04%	18	0.17%	1,651	15.51%	8,880	83.41%	75	0.70%	5	0.05%	250	2.35%
211	SHERMAN	1,416	1,137		10	0.88%	0	0.00%	1	0.09%	3	0.26%	1,118	98.33%	3	0.26%	2	0.18%	164	14.42%
212	SMITH	117,670	101,487		216	0.21%	101	0.10%	423	0.42%	17,342	17.09%	82,609	81.40%	788	0.78%	8	0.01%	4,077	4.02%
213	SOMERVELL	5,466	4,742		13	0.27%	13	0.27%	9	0.19%	7	0.15%	4,638	97.81%	60	1.27%	2	0.04%	295	6.22%
214	STARR	29,326	15,910		1,105	6.95%	1	0.01%	22	0.14%	18	0.11%	13,840	86.99%	914	5.74%	10	0.06%	15,144	95.19%
215	STEPHENS	5,539	4,702		52	1.11%	11	0.23%	4	0.09%	58	1.23%	4,515	96.02%	62	1.32%	0	0.00%	383	8.15%
216	STERLING	827	678		6	0.88%	0	0.00%	0	0.00%	1	0.15%	668	98.53%	3	0.44%	0	0.00%	116	17.11%
217	STONEWALL	1,063	851		5	0.59%	2	0.24%	0	0.00%	19	2.23%	823	96.71%	2	0.24%	0	0.00%	62	7.29%
218	SUTTON	2,434	1,871		22	1.18%	1	0.05%	2	0.11%	1	0.05%	1,831	97.86%	13	0.69%	1	0.05%	715	38.21%
219	SWISHER	4,111	3,199		136	4.25%	2	0.06%	1	0.03%	114	3.56%	2,832	88.53%	113	3.53%	1	0.03%	658	20.57%
220	TARRANT	912,896	790,244		7,318	0.93%	1,105	0.14%	17,418	2.20%	122,684	15.52%	637,248	80.64%	4,346	0.55%	125	0.02%	71,326	9.03%
221	TAYLOR	72,067	62,689		898	1.43%	1,633	2.60%	455	0.73%	3,370	5.38%	56,065	89.43%	264	0.42%	4	0.01%	6,596	10.52%
222	TERRELL	889	702		12	1.71%	2	0.28%	2	0.28%	1	0.14%	685	97.58%	0	0.00%	0	0.00%	238	33.90%
223	TERRY	7,161	5,370		454	8.45%	6	0.11%	4	0.07%	158	2.94%	4,651	86.61%	93	1.73%	4	0.07%	1,756	32.70%
224	THROCKMORTON	1,215	1,037		8	0.77%	1	0.10%	0	0.00%	0	0.00%	1,025	98.84%	3	0.29%	0	0.00%	49	4.73%
225	TITUS	15,328	12,762		42	0.33%	23	0.18%	43	0.34%	1,613	12.64%	10,649	83.44%	386	3.02%	6	0.05%	1,160	9.09%
226	TOM GREEN	59,037	50,381		387	0.77%	68	0.13%	291	0.58%	1,640	3.26%	47,743	94.76%	250	0.50%	2	0.00%	9,897	19.64%
227	TRAVIS	584,466	488,814		9,141	1.87%	549	0.11%	13,291	2.72%	42,369	8.67%	416,775	85.26%	6,626	1.36%	63	0.01%	60,353	12.35%
228	TRINITY	11,392	9,152		13	0.14%	5	0.05%	11	0.12%	801	8.75%	8,273	90.40%	48	0.52%	1	0.01%	221	2.41%
229	TYLER	12,512	10,454		4	0.04%	7	0.07%	7	0.07%	726	6.94%	9,665	92.45%	43	0.41%	2	0.02%	149	1.43%
230	UPSHUR	25,769	21,973		19	0.09%	31	0.14%	27	0.12%	1,843	8.39%	19,980	90.93%	71	0.32%	2	0.01%	412	1.88%
231	UPTON	2,133	1,696		79	4.66%	2	0.12%	1	0.06%	29	1.71%	1,578	93.04%	6	0.35%	1	0.06%	493	29.07%
232	UVALDE	15,752	11,027		1,610	14.60%	11	0.10%	25	0.23%	31	0.28%	9,317	84.49%	30	0.27%	3	0.03%	5,529	50.14%
233	VAL VERDE	26,508	17,882		1,891	10.57%	26	0.15%	80	0.45%	301	1.68%	15,498	86.67%	80	0.45%	6	0.03%	10,288	57.53%
234	VAN ZANDT	31,987	28,075		36	0.13%	39	0.14%	50	0.18%	740	2.64%	27,059	96.38%	150	0.53%	1	0.00%	786	2.80%
235	VICTORIA	49,603	40,870		320	0.78%	32	0.08%	178	0.44%	2,316	5.67%	37,788	92.46%	231	0.57%	5	0.01%	11,121	27.21%
236	WALKER	29,183	25,590		100	0.39%	26	0.10%	92	0.36%	4,593	17.95%	20,469	79.99%	307	1.20%	3	0.01%	1,504	5.88%
237	WALLER	27,678	22,785		202	0.89%	22	0.10%	56	0.25%	7,807	34.26%	13,998	61.44%	696	3.05%	4	0.02%	1,727	7.58%
238	WARD	6,054	5,029		263	5.23%	1	0.02%	5	0.10%	185	3.68%	4,552	90.52%	23	0.46%	0	0.00%	1,679	33.39%
239	WASHINGTON	21,912	18,885		149	0.79%	12	0.06%	125	0.66%	2,780	14.72%	15,373	81.40%	445	2.36%	1	0.01%	780	4.13%
240	WEBB	105,907	64,424		7,805	12.12%	17	0.03%	175	0.27%	222	0.34%	55,292	85.83%	897	1.39%	16	0.02%	54,948	85.29%
241	WHARTON	24,072	19,717		507	2.57%	3	0.02%	32	0.16%	2,882	14.62%	15,774	80.00%	516	2.62%	3	0.02%	3,919	19.88%
242	WHEELER	3,471	2,944		1	0.03%	5	0.17%	8	0.27%	49	1.66%	2,824	95.92%	57	1.94%	0	0.00%	157	5.33%
243	WICHITA	75,990	62,862		179	0.28%	231	0.37%	673	1.07%	5,050	8.03%	56,142	89.31%	580	0.92%	7	0.01%	4,647	7.39%
244	WILBARGER	7,914	6,570		25	0.38%	9	0.14%	25	0.38%	444	6.76%	6,056	92.18%	9	0.14%	2	0.03%	755	11.49%
245	WILLACY	11,083	6,256		425	6.79%	0	0.00%	5	0.08%	37	0.59%	5,481	87.61%	306	4.89%	2	0.03%	4,956	79.22%
246	WILLIAMSON	234,574	207,491		1,468	0.71%	194	0.09%	3,967	1.91%	11,676	5.63%	188,091	90.65%	2,075	1.00%	20	0.01%	19,948	9.61%
247	WILSON	26,517	21,972		223	1.01%	15	0.07%	46	0.21%	380	1.73%	21,109	96.07%	193	0.88%	6	0.03%	5,383	24.50%
248	WINKLER	3,505	2,861		129	4.51%	2	0.07%	3	0.10%	70	2.45%	2,646	92.49%	10	0.35%	1	0.03%	898	31.39%
249	WISE	34,553	31,316		126	0.40%	48	0.15%	56	0.18%	156	0.50%	30,747	98.18%	181	0.58%	2	0.01%	1,599	5.11