

Exhibit 3

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

MARC VEASEY, JANE HAMILTON,)
SERGIO DELEON, FLOYD J. CARRIER,)
ANNA BURNS, MICHAEL MONTEX,)
PENNY POPE, OSCAR ORTIZ, KOBY)
OZIAS, JOHN MELLOR-CRUMLEY, JANE)
DOE, JOHN DOE, LEAGUE OF UNITED)
LATIN AMERICAN CITIZENS (LULAC),)
AND DALLAS COUNTY, TEXAS,)

Plaintiffs,)

v.)

RICK PERRY, Governor of Texas; and JOHN)
STEEN, Texas Secretary of State,)

Defendants.)

) CIVIL ACTION NO.
) 2:13-CV-193 (NGR)
) [Lead case]

UNITED STATES OF AMERICA,)

Plaintiffs,)

v.)

STATE OF TEXAS, JOHN STEEN, in his)
official capacity as Texas Secretary of State;)
and STEVE McCRAW, in his official capacity)
as Director of the Texas Department of Public)
Safety,)

Defendants.)

) CIVIL ACTION NO.
) 2:13-CV-263 (NGR)
) [Consolidated case]

TEXAS STATE CONFERENCE OF NAACP)
BRANCHES; and the MEXICAN)
AMERICAN LEGISLATIVE CAUCUS OF)
THE TEXAS HOUSE OF)
REPRESENTATIVES,)

)	
<i>Plaintiffs,</i>)	
v.)	CIVIL ACTION NO.
)	2:13-CV-291 (NGR)
JOHN STEEN, in his official capacity as)	[Consolidated case]
Secretary of State of Texas; and STEVE)	
McCRAW, in his official capacity as Director)	
of the Texas Department of Public Safety,)	

Defendants.

**DEFENDANTS’ INITIAL DISCLOSURES PURSUANT TO
FEDERAL RULE OF CIVIL PROCEDURE 26(A)**

Defendants hereby submit their Initial Disclosures to Plaintiffs, Consolidated Plaintiffs, and Interested Parties under Rule 26(a)(1) of the Federal Rules of Civil Procedure. Defendants reserve the right to supplement these Initial Disclosures as additional discovery, investigation, and analysis may warrant. Defendants also do not waive any protections provided by any potential privileges, including but not limited to, the legislative privilege, the attorney work product protection, attorney-client privilege, or any other applicable privilege, protection, doctrine, or immunity. Defendants likewise do not waive the right to object, on any and all grounds, to (1) the evidentiary use of the information contained in these Initial Disclosures; and (2) discovery requests relating to these Initial Disclosures. Defendants also incorporate by reference Defendants’ Motion to Dismiss and do not believe Plaintiffs have stated any claims on which relief can be granted and without waiving the same. Defendants provide the following disclosure responses based on the allegations contained in Plaintiffs’ pleadings.

INITIAL DISCLOSURES

A. The name and, if known, the address and telephone number of each person likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

1. The Honorable Patricia Harless
Texas House of Representatives
c/o John B. Scott
Office of the Attorney General
P.O. Box 12548
Austin, Texas 78711-2548
(512) 936-1695

Representative Harless sponsored Senate Bill (SB 14) in the Texas House of Representatives. As the sponsor of SB 14, Representative Harless may have information concerning the goals of the legislation, debates regarding the legislation, amendments to the bill that were offered and considered, and any other matters related to SB 14 and the State's efforts to comply with state and federal law, including the Voting Rights Act, in the passage of this legislation.

2. The Honorable Aaron Peña
c/o John B. Scott
Office of the Attorney General
P.O. Box 12548
Austin, Texas 78711-2548
(512) 936-1695

Representative Peña was a joint sponsor of SB 14 in the Texas House of Representatives. As a joint sponsor of SB 14, Representative Peña may have information concerning the goals of the legislation, debates regarding the legislation, amendments to the bill that were offered and considered, and any other matters related to SB 14 and the State's efforts to comply with state and federal law, including the Voting Rights Act, in the passage of this legislation.

3. The Honorable Larry Gonzales
Texas House of Representatives
c/o John B. Scott
Office of the Attorney General
P.O. Box 12548
Austin, Texas 78711-2548
(512) 936-1695

12. Major Forrest Mitchell
Office of the Attorney General
Law Enforcement Division
c/o John B. Scott
Office of the Attorney General
P.O. Box 12548
Austin, Texas 78711-2548
(512) 936-1695

Major Mitchell is a member of the Special Investigations Unit of the Law Enforcement Division of the Office of the Texas Attorney General. Major Mitchell has knowledge regarding election fraud in the State of Texas, including investigations, prosecutions, and referrals of suspected election fraud to the Texas Attorney General.

13. Ann McGeehan
Assistant General Counsel
Texas County and District Retirement System
901 South Mopac
Barton Oaks Plaza IV, Suite 500
Austin, TX 78745
(512) 328-8889

Ms. McGeehan is the former Director of Elections for the Texas Secretary of State and may have information regarding the development and analysis of S.B. 14. She may be contacted through counsel of record for the State of Texas.

14. Steven C. McCraw
Director
Texas Department of Public Safety
c/o John B. Scott
Office of the Attorney General
P.O. Box 12548
Austin, Texas 78711-2548
(512) 936-1695

Mr. McCraw is a Director at the Texas Department of Public Safety and is responsible for managing and coordinating the Department's operations. He may be contacted through counsel of record for the State of Texas