

TAB 1

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JAN 23 2008

SOLICITOR GENERAL'S OFFICE

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16 Attorneys for Gonzalez Plaintiffs

15 IN THE UNITED STATES DISTRICT COURT  
16 FOR THE DISTRICT OF ARIZONA

17 Maria M. Gonzalez, et al., ) No. CV-06-1268-PHX-ROS (Lead)  
18 ) No. CV-06-1362-PCT-ROS  
19 Plaintiffs, ) No. CV-06-1575-PCT-ROS  
20 )  
21 vs. ) **ANSWERS TO DEFENDANT**  
22 ) **STATE OF ARIZONA AND THE**  
23 ) **ARIZONA SECRETARY**  
24 ) **STATE'S SECOND SET OF**  
25 ) **INTERROGATORIES TO THE**  
26 ) **ARIZONA HISPANIC**  
27 ) **COMMUNITY FORUM**  
28 )  
29 )  
30 ) (Assigned to the Honorable Roslyn O.  
31 ) Silver)

26 Comes now, Plaintiff Arizona Hispanic Community Forum (AHCF), and submit their  
27 Responses to State of Arizona Defendants' Second Set of Interrogatories.  
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**INTERROGATORIES AND ANSWERS**

1. **Identify each and every fact upon which you base your contention that the proof of citizenship requirement of Proposition 200 has a discriminatory impact on Latinos in Arizona.**

**ANSWER:**

Notwithstanding the General Objections, Plaintiff objects to the Interrogatory to the extent that it is overly broad, burdensome and calls for a legal conclusion. Furthermore, Plaintiffs object to the Interrogatory as vague as it does not define the term "discriminatory impact" nor does it specify the scope of the term "Latinos." Without waiving any objections, Plaintiff AHCF directs Defendants to pleadings already filed in the case, discovery responses provided by Defendants and the expert reports of Dr. Louis Lanier, Dr. Richard Engstrom, Dr. F. Arturo Rosales, Dr. Jorge Chapa and Dr. Rodolfo Espino, all of which Defendants have in their possession.

2. **Identify each and every fact upon which you base your contention that the voting identification requirement of Proposition 200 has a discriminatory impact on Latinos in Arizona.**

**ANSWER:**

Same as above.

3. **Identify each and every fact upon which you base your contention that Arizona, or any political subdivision thereof, has a history of official**

1 9. Identify each and every Latino that has been elected to public office in  
2 Arizona, or any political subdivision thereof, including the title of the office, the  
3 jurisdiction of such office, and the date of such election.  
4

5 ANSWER:

6 Notwithstanding the General Objections, Plaintiff objects to the Interrogatory to the  
7 extent that it is overly broad and unduly burdensome. Furthermore, Plaintiffs do not  
8 possess this information and assert it is already in the possession of the Defendants.  
9

10  
11 10. Identify each and every fact upon which you base your contention that  
12 elected officials of Arizona, or of any political subdivision thereof, lack  
13 responsiveness to the particularized needs of Latinos.  
14

15 ANSWER:

16 Notwithstanding the General Objections, Plaintiff objects to the Interrogatory to the  
17 extent that it is vague, overly broad and burdensome. Without waiving any objections,  
18 Plaintiff AHCF directs Defendants to pleadings already filed, discovery responses  
19 provided by Defendants and the expert report of Dr. F. Arturo Rosales, which  
20 Defendants have in their possession.  
21

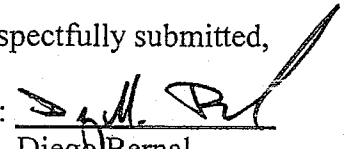
22  
23 11. Identify each and every fact upon which you based your allegation in  
24 paragraph 75 of the First Amended Complaint that "Latinos, among other ethnic  
25 groups, are less likely to possess the forms of identification required under  
26 Proposition 200 to register to vote and cast a ballot."  
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ANSWER:

Without waiving any objections, Plaintiff AHCF directs Defendants to pleadings already filed in the case, discovery responses provided by Defendants and the expert reports of Dr. Louis Lanier, Dr. F. Arturo Rosales, Dr. Jorge Chapa and Dr. Rodolfo Espino, which Defendants have in their possession.

Dated this 18<sup>th</sup> day of January, 2008.      Respectfully submitted,

By:   
Diego Bernal  
Counsel for Plaintiffs Gonzalez, et al.

CERTIFICATE OF SERVICE

I hereby certify that on the 18<sup>th</sup> day of January, 2007 I sent through electronic mail and/or the US Postal Service the forgoing document to the following parties:

Mary O'Grady  
Solicitor General  
Carrie J. Brennan  
Barbara A. Bailey  
Assistant Attorneys General  
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Attorney for Defendants State of Arizona and Secretary of State

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Kathleen Rapp

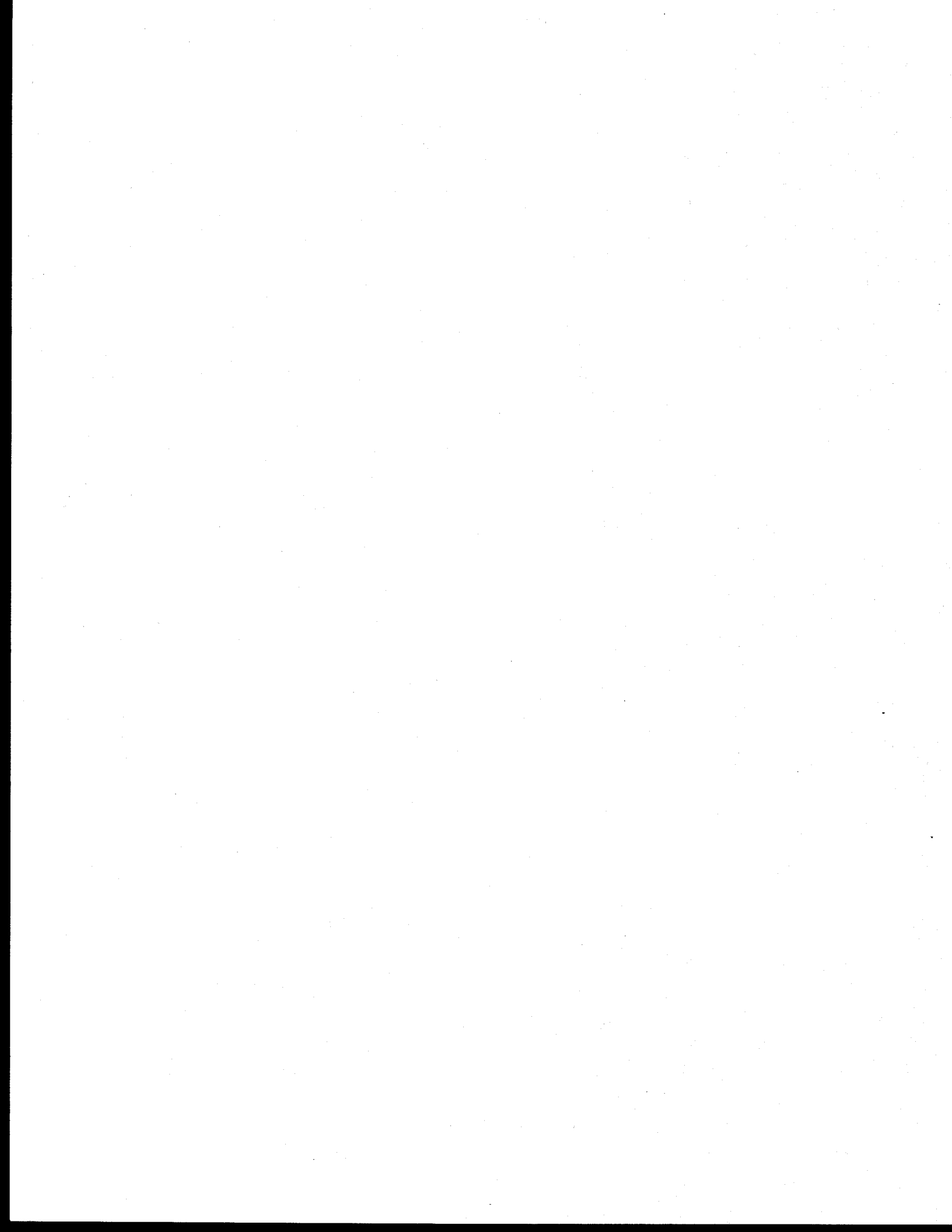
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VERIFICATION OF ANSWERS TO INTERROGATORIES

I, Hector Yturralde, declare, under penalty of perjury under the laws of the United States that the facts stated in the foregoing Interrogatories and Answers are true to the best of my knowledge or belief.

Hector Yturralde

Dated: 1/16/08



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JAN 24 2008  
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Attorneys for Gonzalez Plaintiffs

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

Maria M. Gonzalez, et al.,  
  
Plaintiffs,  
  
vs.  
  
State of Arizona, et al,  
  
Defendants.

) No. CV-06-1268-PHX-ROS (Lead)  
) No. CV-06-1362-PCT-ROS  
) No. CV-06-1575-PCT-ROS  
)  
) **ANSWERS TO DEFENDANT**  
) **STATE OF ARIZONA AND THE**  
) **ARIZONA SECRETARY**  
) **STATE'S SECOND SET OF**  
) **INTERROGATORIES TO**  
) **ASSOCIATION OF**  
) **COMMUNITY**  
) **ORGANIZATIONS FOR**  
) **REFORM NOW**  
)  
) (Assigned to the Honorable Roslyn O.  
Silver)

Comes now, Association of Community Organizations for Reform Now (ACORN), and  
submit their Responses to State of Arizona Defendants' Second Set of Interrogatories.

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**INTERROGATORIES AND ANSWERS**

1. **Identify each and every fact upon which you base your contention that the proof of citizenship requirement of Proposition 200 has a discriminatory impact on Latinos in Arizona.**

**ANSWER:**

Notwithstanding the General Objections, Plaintiff objects to the Interrogatory to the extent that it is overly broad, burdensome and calls for a legal conclusion. Furthermore, Plaintiffs object to the Interrogatory as vague, as it does not define the term "discriminatory impact" nor does it specify the scope of the term "Latinos." Without waiving any objections, Plaintiff ACORN directs Defendants to pleadings already filed in the case, discovery responses provided by Defendants and the expert reports of Dr. Louis Lanier, Dr. Richard Engstrom, Dr. F. Arturo Rosales, Dr. Jorge Chapa and Dr. Rodolfo Espino, all of which Defendants have in their possession.

2. **Identify each and every fact upon which you base your contention that the voting identification requirement of Proposition 200 has a discriminatory impact on Latinos in Arizona.**

**ANSWER:**

Same as above.

3. **Identify each and every fact upon which you base your contention that Arizona, or any political subdivision thereof, has a history of official**

1 **ANSWER:**

2 Notwithstanding the General Objections, Plaintiff objects to the Interrogatory to the  
3 extent that it is overly broad and unduly burdensome. Furthermore, Plaintiffs do no  
4 possess this information and assert it is already in the possession of the Defendants.  
5

6  
7 **10. Identify each and every fact upon which you base your contention that**  
8 **elected officials of Arizona, or of any political subdivision thereof, lack**  
9 **responsiveness to the particularized needs of Latinos.**  
10

11 **ANSWER:**

12 Notwithstanding the General Objections, Plaintiff objects to the Interrogatory to the  
13 extent that it is vague, overly broad and burdensome. Without waiving any objections,  
14 Plaintiff ACORN directs Defendants to pleadings already filed, discovery responses  
15 provided by Defendants and the expert report of Dr. F. Arturo Rosales, which  
16 Defendants have in their possession.  
17

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19  
20 **11. Identify each and every fact upon which you based your allegation in**  
21 **paragraph 75 of the First Amended Complaint that “Latinos, among other ethnic**  
22 **groups, are less likely to possess the forms of identification required under**  
23 **Proposition 200 to register to vote and cast a ballot.”**  
24

25 **ANSWER:**

26 Without waiving any objections, Plaintiff ACORN directs Defendants to pleadings  
27 already filed in the case, discovery responses provided by Defendants and the expert  
28

1 reports of Dr. Louis Lanier, Dr. F. Arturo Rosales, Dr. Jorge Chapa and Dr. Rodolfo  
2 Espino, which Defendants have in their possession.

3  
4  
5 Dated this 23rd day of January, 2008. Respectfully submitted,

6 By:   
7 Diego Bernal  
8 Counsel for Plaintiffs Gonzalez, et al.

9 CERTIFICATE OF SERVICE

10 I hereby certify that on the 23rd day of January, 2007 I sent via electronic mail  
11 and/or the US Postal Service the forgoing document to the following parties:

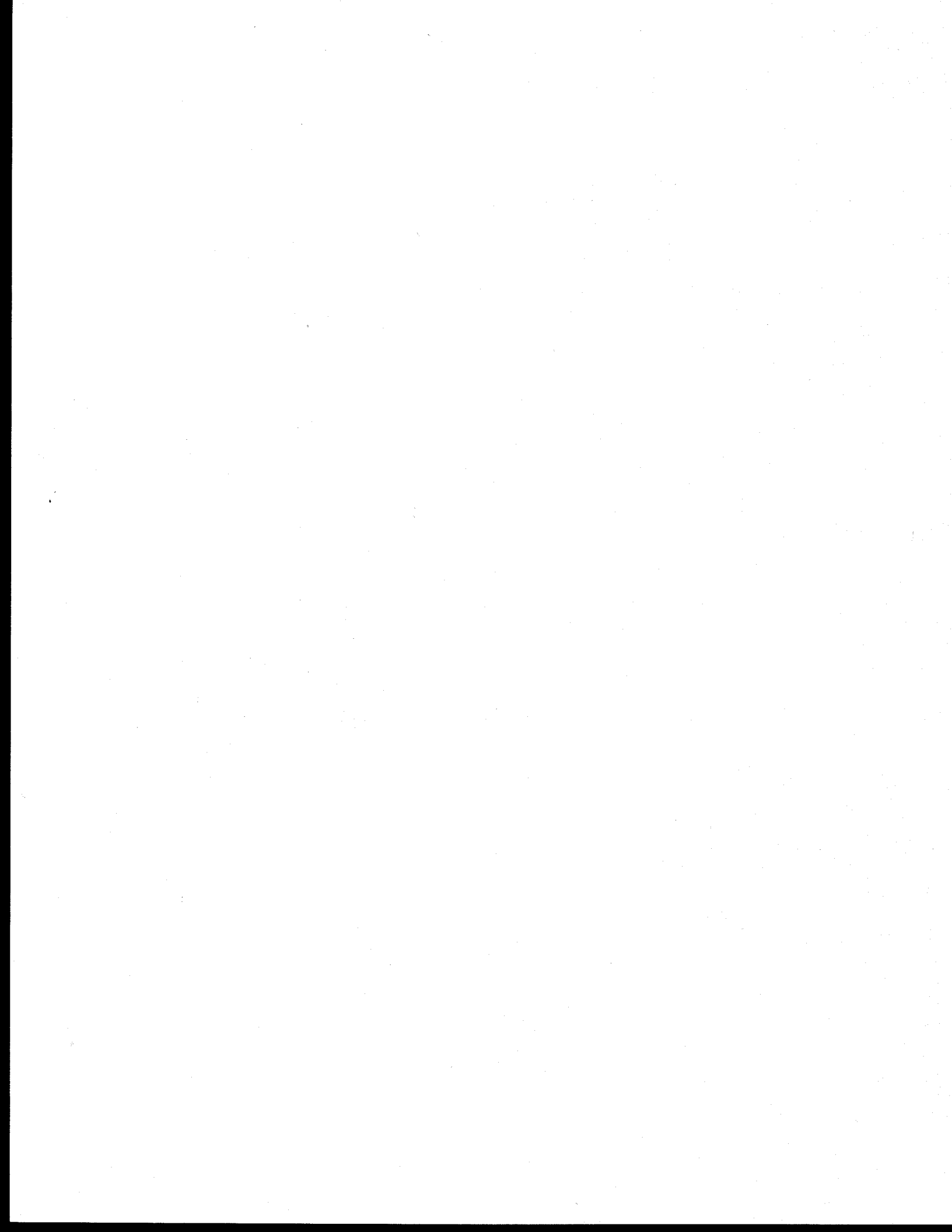
12 Mary O'Grady  
13 Solicitor General  
14 Carrie J. Brennan  
15 Barbara A. Bailey  
16 Assistant Attorneys General  
17 Office of the Attorney General  
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20 Attorney for Defendants State of Arizona and Secretary of State

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16 Attorneys for Gonzalez Plaintiffs

JAN 24 2008  
SOLICITOR GENERAL'S OFFICE

15 IN THE UNITED STATES DISTRICT COURT  
16 FOR THE DISTRICT OF ARIZONA

17 Maria M. Gonzalez, et al.,  
18 Plaintiffs,

19 vs.

20 State of Arizona, et al,  
21 Defendants.

) No. CV-06-1268-PHX-ROS (Lead)  
) No. CV-06-1362-PCT-ROS  
) No. CV-06-1575-PCT-ROS

)  
) **ANSWERS TO DEFENDANT**  
) **STATE OF ARIZONA AND THE**  
) **ARIZONA SECRETARY**  
) **STATE'S SECOND SET OF**  
) **INTERROGATORIES TO**  
) **CHICANOS POR LA CAUSA**

)  
) (Assigned to the Honorable Roslyn O.  
) Silver)

26 Comes now, Chicanos Por La Causa (CPLC), and submit their Responses to State of  
27 Arizona Defendants' Second Set of Interrogatories.  
28

1 INTERROGATORIES AND ANSWERS

2 1. Identify each and every fact upon which you base your contention that the  
3 proof of citizenship requirement of Proposition 200 has a discriminatory impact on  
4 Latinos in Arizona.  
5

6 ANSWER:

7 Notwithstanding the General Objections, Plaintiff objects to the Interrogatory to the  
8 extent that it is overly broad, burdensome and calls for a legal conclusion. Furthermore,  
9 Plaintiffs object to the Interrogatory as vague, as it does not define the term  
10 "discriminatory impact" nor does it specify the scope of the term "Latinos." Without  
11 waiving any objections, Plaintiff CPLC directs Defendants to pleadings already filed in  
12 the case, discovery responses provided by Defendants and the expert reports of Dr.  
13 Louis Lanier, Dr. Richard Engstom, Dr. F. Arturo Rosales, Dr. Jorge Chapa and Dr.  
14 Rodolfo Espino, all of which Defendants have in their possession.  
15  
16  
17

18 2. Identify each and every fact upon which you base your contention that the  
19 voting identification requirement of Proposition 200 has a discriminatory impact  
20 on Latinos in Arizona.  
21

22 ANSWER:

23 Same as above.  
24  
25

26 3. Identify each and every fact upon which you base your contention that  
27 Arizona, or any political subdivision thereof, has a history of official  
28

1 **ANSWER:**

2 Notwithstanding the General Objections, Plaintiff objects to the Interrogatory to the  
3 extent that it is overly broad and unduly burdensome. Furthermore, Plaintiffs do no  
4 possess this information and assert it is already in the possession of the Defendants.  
5

6

7 **10. Identify each and every fact upon which you base your contention that**  
8 **elected officials of Arizona, or of any political subdivision thereof, lack**  
9 **responsiveness to the particularized needs of Latinos.**  
10

11 **ANSWER:**

12 Notwithstanding the General Objections, Plaintiff objects to the Interrogatory to the  
13 extent that it is vague, overly broad and burdensome. Without waiving any objections,  
14 Plaintiff CPLC directs Defendants to pleadings already filed, discovery responses  
15 provided by Defendants and the expert report of Dr. F. Arturo Rosales, which  
16 Defendants have in their possession.  
17

18

19

20 **11. Identify each and every fact upon which you based your allegation in**  
21 **paragraph 75 of the First Amended Complaint that “Latinos, among other ethnic**  
22 **groups, are less likely to possess the forms of identification required under**  
23 **Proposition 200 to register to vote and cast a ballot.”**  
24

25 **ANSWER:**

26 Without waiving any objections, Plaintiff CPLC directs Defendants to pleadings already  
27 filed in the case, discovery responses provided by Defendants and the expert reports of  
28

1 Dr. Louis Lanier, Dr. F. Arturo Rosales, Dr. Jorge Chapa and Dr. Rodolfo Espino,  
2 which Defendants have in their possession.  
3  
4

5 Dated this 23rd day of January, 2008. Respectfully submitted,

6 By:   
7 Diego Bernal  
8 Counsel for Plaintiffs Gonzalez, et al.

9  
10 CERTIFICATE OF SERVICE

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and/or the US Postal Service the forgoing document to the following parties:

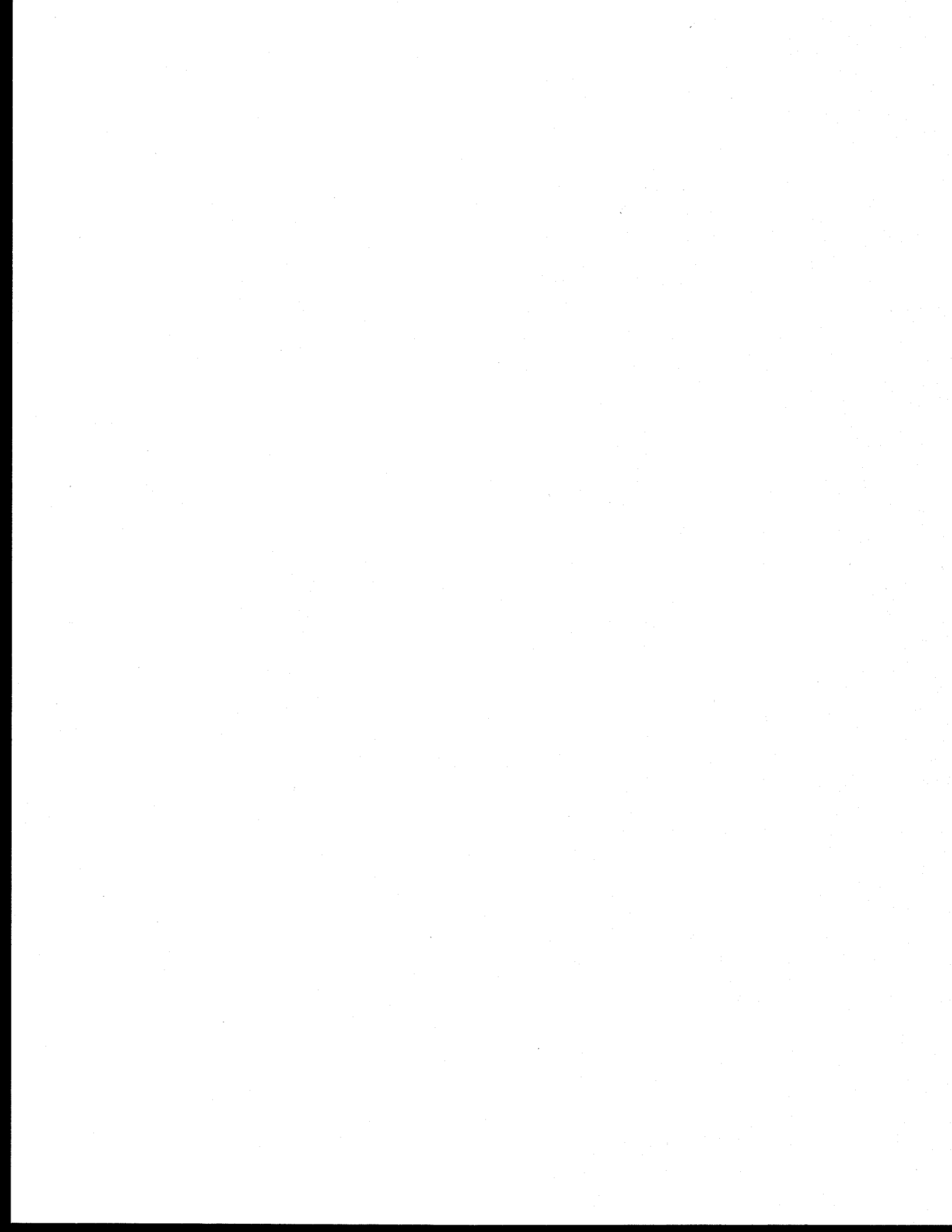
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Attorneys for 13 County Defendants



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15 ksansdstrom@perkinscoie.com  
16 Attorneys for Gonzalez Plaintiffs

15 IN THE UNITED STATES DISTRICT COURT  
16 FOR THE DISTRICT OF ARIZONA

17 Maria M. Gonzalez, et al., ) No. CV-06-1268-PHX-ROS (Lead)  
18 ) No. CV-06-1362-PCT-ROS  
19 Plaintiffs, ) No. CV-06-1575-PCT-ROS  
20 )  
21 vs. ) **ANSWERS TO DEFENDANT**  
22 ) **STATE OF ARIZONA AND THE**  
23 ) **ARIZONA SECRETARY**  
24 ) **STATE'S SECOND SET OF**  
25 ) **INTERROGATORIES TO**  
26 ) **COMMON CAUSE**  
27 )  
28 ) (Assigned to the Honorable Roslyn O.  
Silver)

26 Comes now, Plaintiff Common Cause and submit their Responses to State of Arizona  
27 Defendants' Second Set of Interrogatories.  
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**INTERROGATORIES AND ANSWERS**

1. **Identify each and every fact upon which you base your contention that the proof of citizenship requirement of Proposition 200 has a discriminatory impact on Latinos in Arizona.**

**ANSWER:**

Notwithstanding the General Objections, Plaintiff objects to the Interrogatory to the extent that it is overly broad, burdensome and calls for a legal conclusion. Furthermore, Plaintiffs object to the Interrogatory as vague as it does not define the term "discriminatory impact" nor does it specify the scope of the term "Latinos." Without waiving any objections, Plaintiff Common Cause directs Defendants to pleadings already filed in the case, discovery responses provided by Defendants and the expert reports of Dr. Louis Lanier, Dr. Richard Engstom, Dr. F. Arturo Rosales, Dr. Jorge Chapa and Dr. Rodolfo Espino, all of which Defendants have in their possession.

2. **Identify each and every fact upon which you base your contention that the voting identification requirement of Proposition 200 has a discriminatory impact on Latinos in Arizona.**

**ANSWER:**

Same as above.

3. **Identify each and every fact upon which you base your contention that Arizona, or any political subdivision thereof, has a history of official**

1 11. Identify each and every fact upon which you based your allegation in  
2 paragraph 75 of the First Amended Complaint that "Latinos, among other ethnic  
3 groups, are less likely to possess the forms of identification required under  
4 Proposition 200 to register to vote and cast a ballot."  
5

6 ANSWER:

7 Without waiving any objections, Plaintiff Common Cause directs Defendants to  
8 pleadings already filed in the case, discovery responses provided by Defendants and the  
9 expert reports of Dr. Louis Lanier, Dr. F. Arturo Rosales, Dr. Jorge Chapa and Dr.  
10 Rodolfo Espino, which Defendants have in their possession.  
11

12 Dated this 18<sup>th</sup> day of January, 2008. Respectfully submitted,

13  
14 By: 

Diego Bernal

Counsel for Plaintiffs Gonzalez, et al.  
15  
16

17 CERTIFICATE OF SERVICE

18 I hereby certify that on the 18<sup>th</sup> day of January, 2007 I sent via facsimile and/or  
19 the US Postal Service the forgoing document to the following parties:

20 Mary O'Grady  
Solicitor General  
21 Carrie J. Brennan  
Barbara A. Bailey  
22 Assistant Attorneys General  
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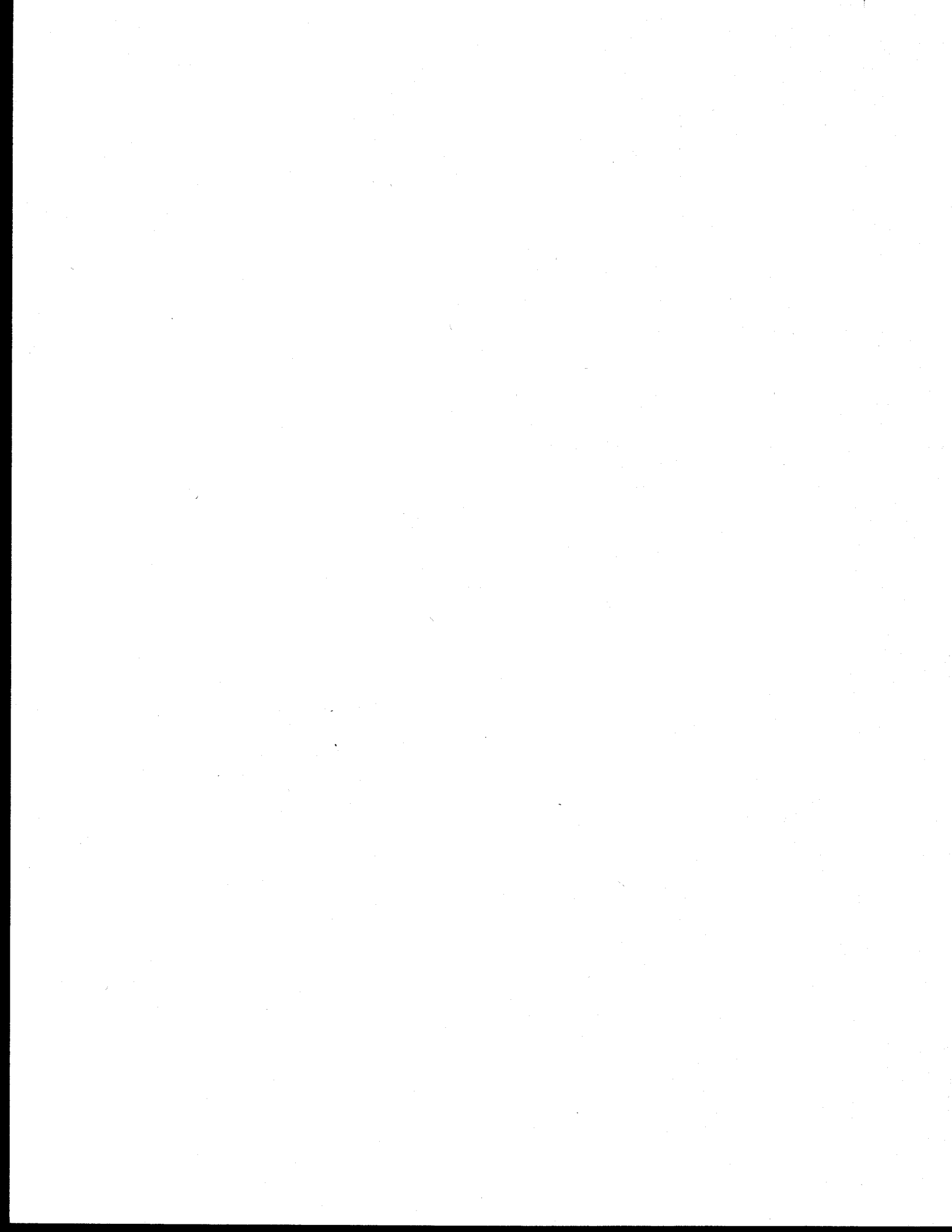
25 Attorney for Defendants State of Arizona and Secretary of State  
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VERIFICATION OF ANSWERS TO INTERROGATORIES

I, Arn H. Pearson, declare, under penalty of perjury under the laws of the United States that the facts stated in the foregoing Interrogatories and Answers are true to the best of my knowledge or belief.

Dated: 1/17/08 Arn H. Pearson



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2 Diego Bernal, TX SBN: 24048350  
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4 DEFENSE AND EDUCATIONAL FUND  
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16 Attorneys for Gonzalez Plaintiffs

15 IN THE UNITED STATES DISTRICT COURT  
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17 Maria M. Gonzalez, et al.,  
18 Plaintiffs,

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21 Defendants.

) No. CV-06-1268-PHX-ROS (Lead)  
) No. CV-06-1362-PCT-ROS  
) No. CV-06-1575-PCT-ROS  
)

) **ANSWERS TO DEFENDANT**  
) **STATE OF ARIZONA AND THE**  
) **ARIZONA SECRETARY**  
) **STATE'S SECOND SET OF**  
) **INTERROGATORIES TO**  
) **FRIENDLY HOUSE**  
)

) (Assigned to the Honorable Roslyn O.  
) Silver)  
)

26 Comes now, Plaintiff Friendly House, and submit their Responses to State of Arizona  
27 Defendants' Second Set of Interrogatories.  
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**INTERROGATORIES AND ANSWERS**

1. Identify each and every fact upon which you base your contention that the proof of citizenship requirement of Proposition 200 has a discriminatory impact on Latinos in Arizona.

**ANSWER:**

Notwithstanding the General Objections, Plaintiff objects to the Interrogatory to the extent that it is overly broad, burdensome and calls for a legal conclusion. Furthermore, Plaintiffs object to the Interrogatory as vague as it does not define the term "discriminatory impact" nor does it specify the scope of the term "Latinos." Without waiving any objections, Plaintiff Friendly House directs Defendants to pleadings already filed in the case, discovery responses provided by Defendants and the expert reports of Dr. Louis Lanier, Dr. Richard Engstrom, Dr. F. Arturo Rosales, Dr. Jorge Chapa and Dr. Rodolfo Espino, all of which Defendants have in their possession.

2. Identify each and every fact upon which you base your contention that the voting identification requirement of Proposition 200 has a discriminatory impact on Latinos in Arizona.

**ANSWER:**

Same as above.

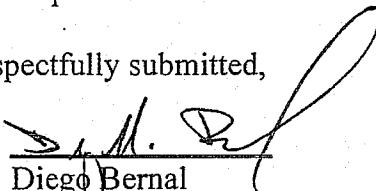
3. Identify each and every fact upon which you base your contention that Arizona, or any political subdivision thereof, has a history of official

1 11. Identify each and every fact upon which you based your allegation in  
2 paragraph 75 of the First Amended Complaint that "Latinos, among other ethnic  
3 groups, are less likely to possess the forms of identification required under  
4 Proposition 200 to register to vote and cast a ballot."  
5

6 **ANSWER:**

7 Without waiving any objections, Plaintiff Friendly House directs Defendants to  
8 pleadings already filed in the case, discovery responses provided by Defendants and the  
9 expert reports of Dr. Louis Lanier, Dr. F. Arturo Rosales, Dr. Jorge Chapa and Dr.  
10 Rodolfo Espino, which Defendants have in their possession.  
11

12 Dated this 18<sup>th</sup> day of January, 2008. Respectfully submitted,

13  
14 By:   
15 Diego Bernal  
16 Counsel for Plaintiffs Gonzalez, et al.

17 **CERTIFICATE OF SERVICE**

18 I hereby certify that on the 18<sup>th</sup> day of January, 2007 I sent via facsimile and/or  
19 the US Postal Service the forgoing document to the following parties:

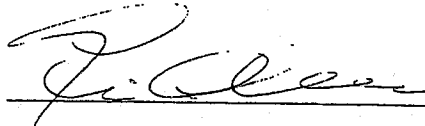
20 Mary O'Grady  
21 Solicitor General  
22 Carrie J. Brennan  
23 Barbara A. Bailey  
24 Assistant Attorneys General  
25 Office of the Attorney General  
26 1275 W. Washington Street  
27 Phoenix, Arizona 85007-2926

28 Attorney for Defendants State of Arizona and Secretary of State

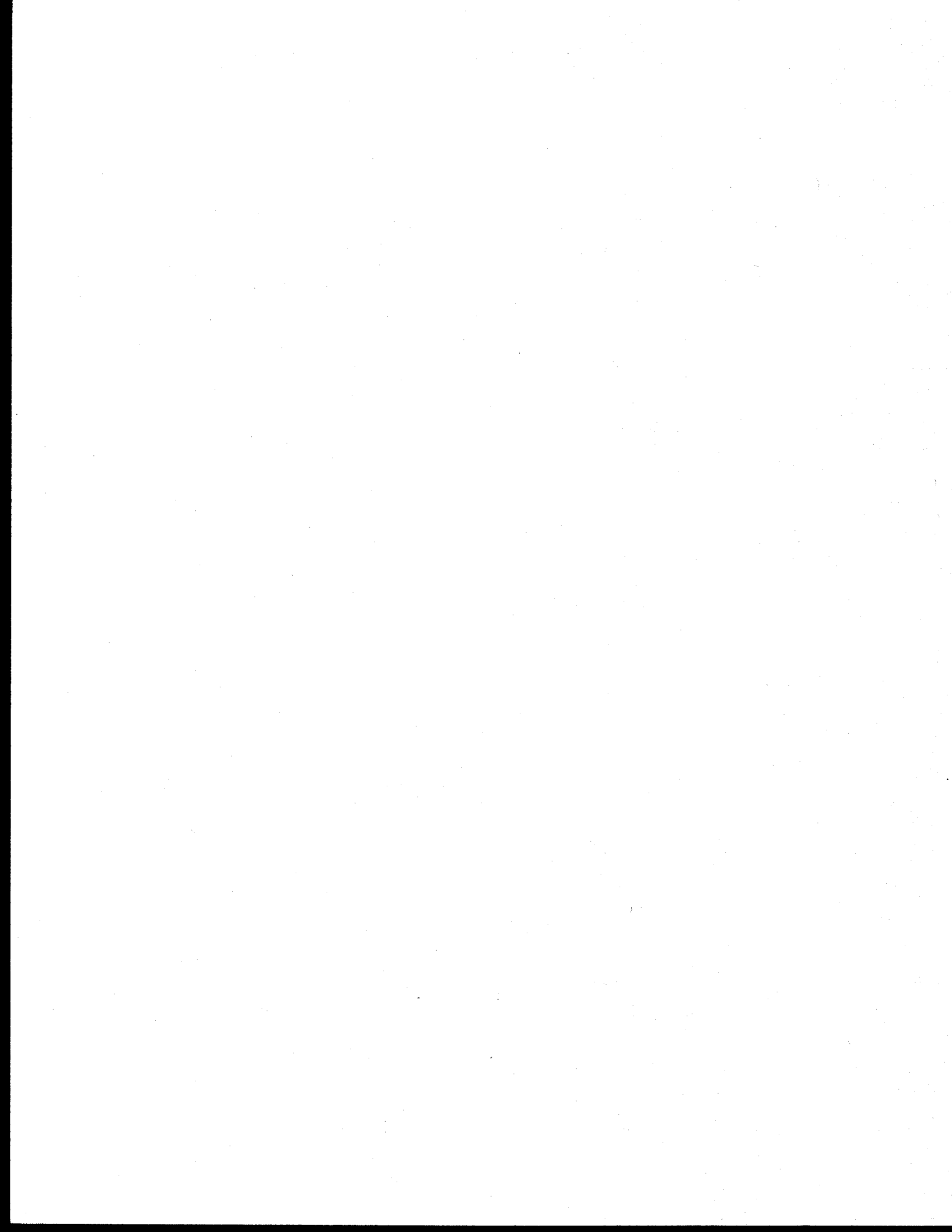
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VERIFICATION OF ANSWERS TO INTERROGATORIES

I, Luis IBARRA, declare, under penalty of perjury under the laws of the United States that the facts stated in the foregoing Interrogatories and Answers are true to the best of my knowledge or belief.



Dated: 1/15/08



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2 Diego Bernal, TX SBN: 24048350  
3 MEXICAN AMERICAN LEGAL  
4 DEFENSE AND EDUCATIONAL FUND  
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6 San Antonio, TX 78205  
7 Ph: (210) 224-5476  
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JAN 24 2008  
SOLICITOR GENERAL'S OFFICE

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13 Washington, D.C. 20005  
14 Ph:(202)434-1639  
15 ksansdstrom@perkinscoie.com  
16 Attorneys for Gonzalez Plaintiffs

15 IN THE UNITED STATES DISTRICT COURT  
16 FOR THE DISTRICT OF ARIZONA

17 Maria M. Gonzalez, et al., ) No. CV-06-1268-PHX-ROS (Lead)  
18 ) No. CV-06-1362-PCT-ROS  
19 Plaintiffs, ) No. CV-06-1575-PCT-ROS  
20 )  
21 vs. ) **ANSWERS TO DEFENDANT**  
22 ) **STATE OF ARIZONA AND THE**  
23 State of Arizona, et al, ) **ARIZONA SECRETARY**  
24 ) **STATE'S SECOND SET OF**  
25 Defendants. ) **INTERROGATORIES TO**  
26 ) **PROJECT VOTE**  
27 )  
28 ) (Assigned to the Honorable Roslyn O.  
Silver)

26 Comes now, Project Vote, and submit their Responses to State of Arizona Defendants'  
27 Second Set of Interrogatories.  
28

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**INTERROGATORIES AND ANSWERS**

1. **Identify each and every fact upon which you base your contention that the proof of citizenship requirement of Proposition 200 has a discriminatory impact on Latinos in Arizona.**

**ANSWER:**

Notwithstanding the General Objections, Plaintiff objects to the Interrogatory to the extent that it is overly broad, burdensome and calls for a legal conclusion. Furthermore, Plaintiffs object to the Interrogatory as vague, as it does not define the term "discriminatory impact" nor does it specify the scope of the term "Latinos." Without waiving any objections, Plaintiff Project Vote directs Defendants to pleadings already filed in the case, discovery responses provided by Defendants and the expert reports of Dr. Louis Lanier, Dr. Richard Engstom, Dr. F. Arturo Rosales, Dr. Jorge Chapa and Dr. Rodolfo Espino, all of which Defendants have in their possession.

2. **Identify each and every fact upon which you base your contention that the voting identification requirement of Proposition 200 has a discriminatory impact on Latinos in Arizona.**

**ANSWER:**

Same as above.

3. **Identify each and every fact upon which you base your contention that Arizona, or any political subdivision thereof, has a history of official**

1 9. Identify each and every Latino that has been elected to public office in  
2 Arizona, or any political subdivision thereof, including the title of the office, the  
3 jurisdiction of such office, and the date of such election.  
4

5 ANSWER:

6 Notwithstanding the General Objections, Plaintiff objects to the Interrogatory to the  
7 extent that it is overly broad and unduly burdensome. Furthermore, Plaintiffs do not  
8 possess this information and assert it is already in the possession of the Defendants.  
9  
10

11 10. Identify each and every fact upon which you base your contention that  
12 elected officials of Arizona, or of any political subdivision thereof, lack  
13 responsiveness to the particularized needs of Latinos.  
14

15 ANSWER:

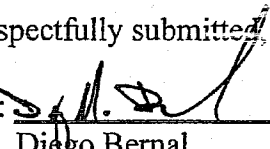
16 Notwithstanding the General Objections, Plaintiff objects to the Interrogatory to the  
17 extent that it is vague, overly broad and burdensome. Without waiving any objections,  
18 Plaintiff Project Vote directs Defendants to pleadings already filed, discovery responses  
19 provided by Defendants and the expert report of Dr. F. Arturo Rosales, which  
20 Defendants have in their possession.  
21  
22

23 11. Identify each and every fact upon which you based your allegation in  
24 paragraph 75 of the First Amended Complaint that "Latinos, among other ethnic  
25 groups, are less likely to possess the forms of identification required under  
26 Proposition 200 to register to vote and cast a ballot."  
27  
28

1 ANSWER:

2 Without waiving any objections, Plaintiff Project Vote directs Defendants to pleadings  
3 already filed in the case, discovery responses provided by Defendants and the expert  
4 reports of Dr. Louis Lanier, Dr. F. Arturo Rosales, Dr. Jorge Chapa and Dr. Rodolfo  
5 Espino, which Defendants have in their possession.  
6

7  
8 Dated this 23rd day of January, 2008. Respectfully submitted

9  
10 By:   
11 Diego Bernal  
12 Counsel for Plaintiffs Gonzalez, et al.

13 CERTIFICATE OF SERVICE

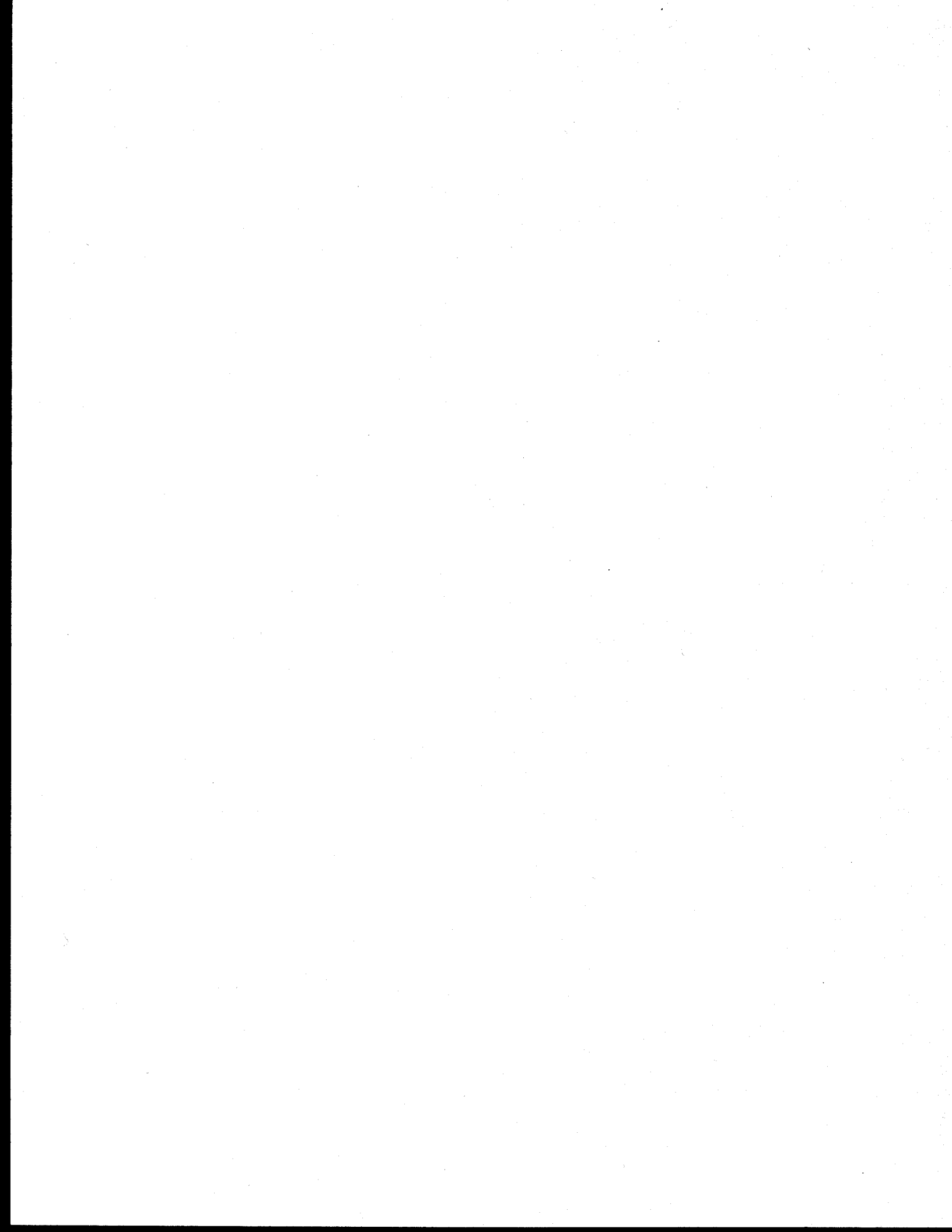
14 I hereby certify that on the 23rd day of January, 2007 I sent via electronic mail  
15 and/or the US Postal Service the forgoing document to the following parties:

16 Mary O'Grady  
17 Solicitor General  
18 Carrie J. Brennan  
19 Barbara A. Bailey  
20 Assistant Attorneys General  
21 Office of the Attorney General  
22 1275 W. Washington Street  
23 Phoenix, Arizona 85007-2926

24 Attorney for Defendants State of Arizona and Secretary of State

25 M. Colleen Connor  
26 MCAO Division of County Counsel  
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Dennis I. Wilenchik  
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JAN 23 2008

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15 ksandstrom@perkinscoie.com  
16 Attorneys for Gonzalez Plaintiffs

15 IN THE UNITED STATES DISTRICT COURT  
16 FOR THE DISTRICT OF ARIZONA

17 Maria M. Gonzalez, et al.,  
18 Plaintiffs,

19 vs.

20 State of Arizona, et al,  
21 Defendants.

) No. CV-06-1268-PHX-ROS (Lead)  
) No. CV-06-1362-PCT-ROS  
) No. CV-06-1575-PCT-ROS

)  
) **ANSWERS TO DEFENDANT**  
) **STATE OF ARIZONA AND THE**  
) **ARIZONA SECRETARY**  
) **STATE'S SECOND SET OF**  
) **INTERROGATORIES TO**  
) **SOUTHWEST VOTER**  
) **REGISTRATION AND**  
) **EDUCATION PROJECT**

)  
)  
) (Assigned to the Honorable Roslyn O.  
Silver)

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**ANSWER:**

Same as above.

**3. Identify each and every fact upon which you base your contention that Arizona, or any political subdivision thereof, has a history of official discrimination that touched the right of any Latinos to register, to vote, or otherwise to participate in the democratic process.**

**ANSWER:**

Notwithstanding the General Objections, Plaintiff objects to the Interrogatory to the extent that it is overly broad and burdensome. Furthermore, the term "touched the right" is ambiguous and Defendants provide no guidance as to what this term encompasses. Without waiving any objections, Plaintiff SVREP directs Defendants to pleadings already filed in the case, discovery responses provided by Defendants and the expert report of Dr. F. Arturo Rosales, which Defendants have in their possession.

**4. Identify each and every fact upon which you base your contention that voting in the elections of the State, or any political subdivision thereof, is racially polarized with regard to Latinos.**

**ANSWER:**

Notwithstanding the General Objections, Plaintiff objects to the Interrogatory to the extent that it is overly broad and burdensome. Without waiving any objections, Plaintiff SVREP directs Defendants to pleadings already filed in the case, discovery responses

1 11. Identify each and every fact upon which you based your allegation in  
2 paragraph 75 of the First Amended Complaint that "Latinos, among other ethnic  
3 groups, are less likely to possess the forms of identification required under  
4 Proposition 200 to register to vote and cast a ballot."  
5

6 **ANSWER:**

7 Without waiving any objections, Plaintiff SVREP directs Defendants to pleadings  
8 already filed in the case, discovery responses provided by Defendants and the expert  
9 reports of Dr. Louis Lanier, Dr. F. Arturo Rosales, Dr. Jorge Chapa and Dr. Rodolfo  
10 Espino, which Defendants have in their possession.  
11

12 Dated this 18<sup>th</sup> day of January, 2008. Respectfully submitted,

13  
14 By: 

15 Diego Bernal

16 Counsel for Plaintiffs Gonzalez, et al.

17 **CERTIFICATE OF SERVICE**

18 I hereby certify that on the 18<sup>th</sup> day of January, 2007 I sent via facsimile and/or  
19 the US Postal Service the forgoing document to the following parties:

20 Mary O'Grady  
21 Solicitor General  
22 Carrie J. Brennan  
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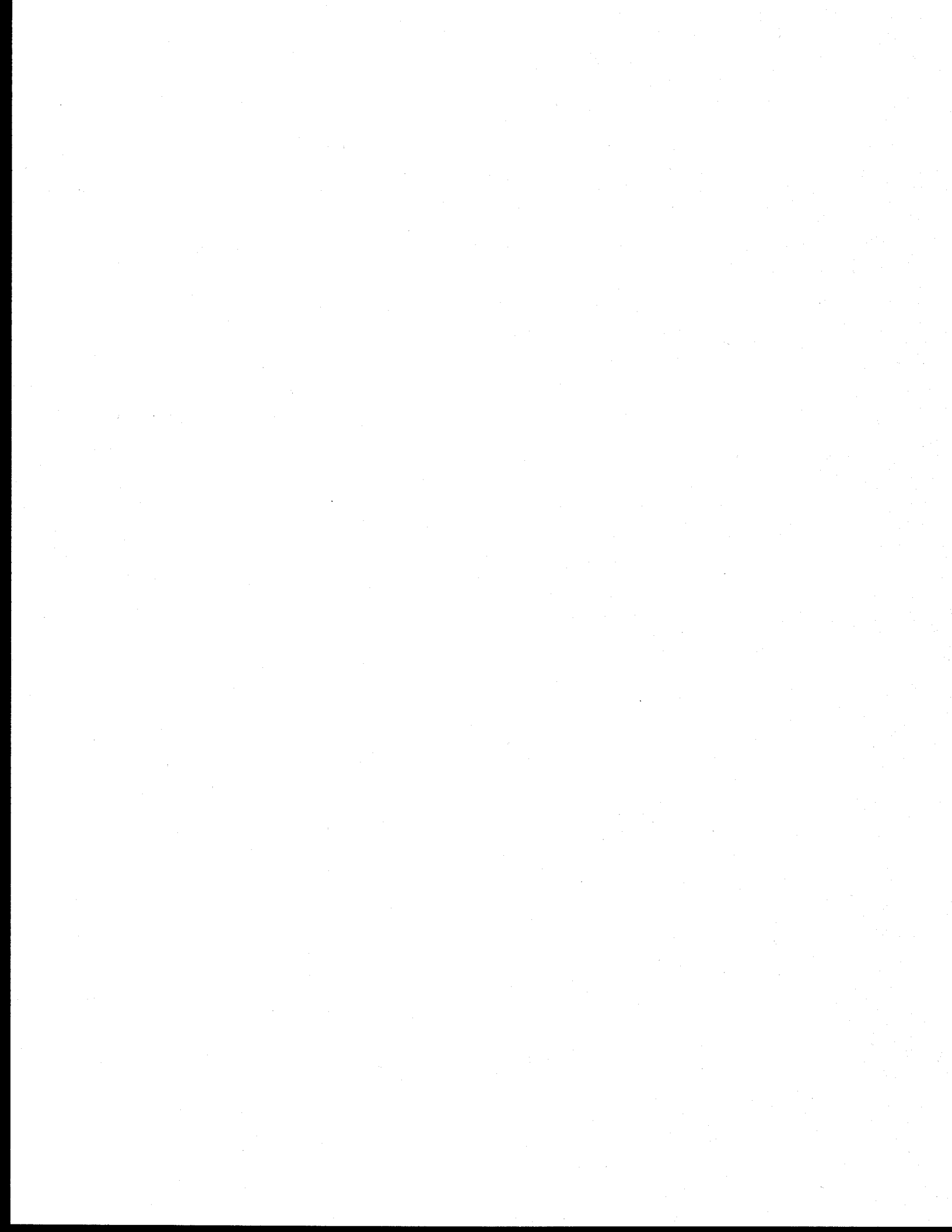
28 Attorney for Defendants State of Arizona and Secretary of State

VERIFICATION OF ANSWERS TO INTERROGATORIES

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I, ANTONIO FONZALE declare, under penalty of perjury under the laws of the United States that the facts stated in the foregoing Interrogatories and Answers are true to the best of my knowledge or belief.

Dated: 1-10-09 [Signature]



1 Nina Perales, TX SBN: 24005046  
2 Diego Bernal, TX SBN: 24048350  
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JAN 24 2008  
SOLICITOR GENERAL'S OFFICE

6 Daniel R. Ortega, Jr., SBN: 005015  
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14 Ph:(202)434-1639  
15 ksansdstrom@perkinscoie.com  
16 Attorneys for Gonzalez Plaintiffs

15 IN THE UNITED STATES DISTRICT COURT  
16 FOR THE DISTRICT OF ARIZONA

17 Maria M. Gonzalez, et al., ) No. CV-06-1268-PHX-ROS (Lead)  
18 ) No. CV-06-1362-PCT-ROS  
19 Plaintiffs, ) No. CV-06-1575-PCT-ROS  
20 )  
21 vs. ) **ANSWERS TO DEFENDANT**  
22 ) **STATE OF ARIZONA AND THE**  
23 ) **ARIZONA SECRETARY**  
24 ) **STATE'S SECOND SET OF**  
25 ) **INTERROGATORIES TO VALLE**  
26 ) **DEL SOL**  
27 ) (Assigned to the Honorable Roslyn O.  
28 ) Silver)

26 Comes now, Valle Del Sol, and submit their Responses to State of Arizona Defendants'  
27 Second Set of Interrogatories.  
28



1 9. Identify each and every Latino that has been elected to public office in  
2 Arizona, or any political subdivision thereof, including the title of the office, the  
3 jurisdiction of such office, and the date of such election.  
4

5 **ANSWER:**

6 Notwithstanding the General Objections, Plaintiff objects to the Interrogatory to the  
7 extent that it is overly broad and unduly burdensome. Furthermore, Plaintiffs do not  
8 possess this information and assert it is already in the possession of the Defendants.  
9  
10

11 10. Identify each and every fact upon which you base your contention that  
12 elected officials of Arizona, or of any political subdivision thereof, lack  
13 responsiveness to the particularized needs of Latinos.  
14

15 **ANSWER:**

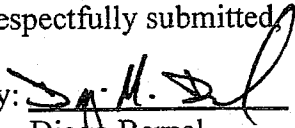
16 Notwithstanding the General Objections, Plaintiff objects to the Interrogatory to the  
17 extent that it is vague, overly broad and burdensome. Without waiving any objections,  
18 Plaintiff Valle Del Sol directs Defendants to pleadings already filed, discovery  
19 responses provided by Defendants and the expert report of Dr. F. Arturo Rosales, which  
20 Defendants have in their possession.  
21  
22

23 11. Identify each and every fact upon which you based your allegation in  
24 paragraph 75 of the First Amended Complaint that "Latinos, among other ethnic  
25 groups, are less likely to possess the forms of identification required under  
26 Proposition 200 to register to vote and cast a ballot."  
27  
28

1 ANSWER:

2 Without waiving any objections, Plaintiff Valle Del Sol directs Defendants to pleadings  
3 already filed in the case, discovery responses provided by Defendants and the expert  
4 reports of Dr. Louis Lanier, Dr. F. Arturo Rosales, Dr. Jorge Chapa and Dr. Rodolfo  
5 Espino, which Defendants have in their possession.  
6

7  
8 Dated this 23rd day of January, 2008. Respectfully submitted,

9  
10 By:   
11 Diego Bernal  
12 Counsel for Plaintiffs Gonzalez, et al.

13 CERTIFICATE OF SERVICE

14 I hereby certify that on the 23rd day of January, 2007 I sent via electronic mail  
15 and/or the US Postal Service the forgoing document to the following parties:

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24 Attorney for Defendants State of Arizona and Secretary of State

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(602) 506-8567 (fax)

Dennis I. Wilenchik  
Kathleen Rapp  
Wilenchik and Bartness, P.C.

TAB 2

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2 Diego Bernal, TX SBN: 24048350  
3 MEXICAN AMERICAN LEGAL  
4 DEFENSE AND EDUCATIONAL FUND  
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15 [ksansdstrom@perkinscoie.com](mailto:ksansdstrom@perkinscoie.com)

14 Attorneys for Gonzalez Plaintiffs

16 IN THE UNITED STATES DISTRICT COURT  
17 FOR THE DISTRICT OF ARIZONA

18 Maria M. Gonzalez, et al., ) No. CV-06-1268-PHX-ROS(Lead)  
19 ) No. CV-06-1362-PCT-ROS  
20 Plaintiffs, ) No. CV-06-1575-PCT-ROS  
21 )  
22 vs. ) **SUPPLEMENTAL ANSWERS TO**  
23 ) **DEFENDANTS STATE OF**  
24 ) **ARIZONA AND THE ARIZONA**  
25 ) **SECRETARY OF STATE'S**  
26 ) **SECOND SET OF**  
27 ) **INTERROGATORIES TO**  
28 ) **ARIZONA HISPANIC**  
 ) **COMMUNITY FORUM**  
 )  
 ) (Assigned to the Honorable Roslyn  
 ) O. Silver)

1  
2 Comes now, Plaintiff Arizona Hispanic Community Forum (AHCF), and submit  
3 their Supplemental Answers to State Defendants' Second Set of Interrogatories.  
4

5 **GENERAL OBJECTIONS**

6 The following General Objections are applicable to and incorporated into each  
7 Interrogatory answer:

- 8  
9 1. Plaintiff objects to each Interrogatory to the extent that it calls for trial  
10 preparation material or work product, or for information protected by the attorney-client  
11 privilege, co-party privilege; Constitutional, statutory, or common-law privacy rights, or  
12 any other recognized privilege or immunity from disclosure.  
13  
14 2. Plaintiff objects to each Interrogatory served by Defendant in this action to the  
15 extent that it is extensively broad, burdensome, oppressive, vague or generally  
16 unspecific as to what a full and complete answer is.  
17  
18 3. Plaintiff objects to the Definitions and Instructions to the extent they may  
19 purport to impose any obligation greater than that allowed by the Federal Rules of Civil  
20 Procedure.  
21  
22 4. Plaintiff asserts these objections without waiving or intending to waive any  
23 objections as to competence, relevance, materiality or privilege.  
24  
25 5. Plaintiff reserves the right to supplement these answers with subsequently  
26 obtained or discovered information.  
27

28 Subject to and without waiving the foregoing objections, and incorporating them  
by reference into each of the answers provided below, Plaintiff responds to Defendant's  
Second Set of Interrogatories as follows:

**INTERROGATORIES**

1. **Identify each and every fact upon which you base your contention that the proof of citizenship requirement of Proposition 200 has a discriminatory impact on Latinos in Arizona.**

Answer:

1 Without waiving any general objections and objections previously stated in  
2 response to this interrogatory, Plaintiff further objects to the interrogatory to the extent  
3 that it seeks an impermissible narrative account of Plaintiff's case and claims.  
4

5 Plaintiff AHCF supplements its answer to the interrogatory as follows:

6 Latinos are less likely to be able to satisfy the proof of citizenship requirement of  
7 Proposition 200 because, among other things, they have a lower socio-economic status  
8 when compared to non-Latinos or Anglos and comprise a greater proportion of  
9 naturalized citizens when compared to non-Latinos or Anglos in Arizona.  
10

11 Latinos are less likely than non-Latinos or Anglos to cure a voter registration  
12 application that has been rejected by the County Recorder for failure to provide proof of  
13 citizenship of Proposition 200.  
14

15 Rejected voter registration forms provided by Defendants in discovery  
16 demonstrate that the proof of citizenship requirement of Proposition 200 has resulted in  
17 the rejection of a proportionally greater number of applications form Latinos than non-  
18 Latinos or Anglos.  
19

20 The statewide voter registration rolls provided by Defendants in discovery  
21 demonstrate that the proof of citizenship requirement of Proposition 200 has resulted in  
22 a proportionally smaller number of Latinos being added to the voter rolls as compared  
23 to non-Latinos or Anglos.  
24

25 Mr. Jesus Gonzalez is a Latino U.S. citizen but had his voter registration  
26 applications rejected twice for failure to the provide proof of citizenship required by  
27 Proposition 200.  
28

1 Mrs. Maria Gonzalez is a Latina U.S. citizen but had her voter registration  
2 application rejected for failure to provide the proof of citizenship required by  
3 Proposition 200.  
4

5 Latinos who attempt to register to vote in community-based registration  
6 campaigns are unlikely to have on their person at the time of registration the proof of  
7 citizenship required by Proposition 200.  
8

9 **2. Identify each and every fact upon which you base your contention**  
10 **that the voting identification requirement of Proposition 200 has a**  
11 **discriminatory impact on Latinos in Arizona.**

12 Answer:

13 Without waiving any general objections and objections previously stated in  
14 response to this interrogatory, Plaintiff further objects to the interrogatory to the extent  
15 that it seeks an impermissible narrative account of Plaintiff's case and claims.  
16

17 Plaintiff AHCF supplements its answer to the interrogatory as follows:

18 Latinos are less likely to be able to satisfy the voter identification requirement of  
19 Proposition 200 because, among other things, they have a lower socio-economic status  
20 when compared to non-Latinos or Anglos.  
21

22 Because most County Defendants thus far have refused to disclose the uncounted  
23 conditional provisional ballots as required by the Court's January 22, 2008 Order and  
24 Gonzalez Plaintiffs' subsequent subpoenas, Gonzalez Plaintiffs are unable to describe at  
25 this time how the discovery provided by Defendants relates to the facts contended by  
26  
27  
28

1 Gonzalez Plaintiffs with respect to the disparate impact of the voter identification  
2 requirements of Proposition 200.

3  
4 **3. Identify each and every fact upon which you base your contention that**  
5 **Arizona, or any political subdivision thereof, has a history of official**  
6 **discrimination that touched the right of any Latinos to register, to vote, or to**  
7 **otherwise participate in democratic process.**

8 Answer:

9 Without waiving any general objections and objections previously stated in  
10 response to this interrogatory, Plaintiff further objects to the interrogatory to the extent  
11 that it seeks an impermissible narrative account of Plaintiff's case and claims.

12  
13 **4. Identify each and every fact upon which you base your contention that**  
14 **voting in the elections of the State, or any political subdivision thereof, is**  
15 **racially polarized with regard to Latinos.**

16 Answer:

17 Without waiving any general objections and objections previously stated in  
18 response to this interrogatory, Plaintiff further objects to the interrogatory to the extent  
19 that it seeks an impermissible narrative account of Plaintiff's case and claims.

20 Plaintiff AHCF supplements its answer to the interrogatory as follows:

21 Latinos vote cohesively for their candidate of choice in Arizona.

22  
23 Anglos vote as a bloc normally to defeat the Latino candidate of choice in  
24 Arizona.

25  
26 Voting between Latinos and Anglos was racially polarized in the following  
27 recent Arizona elections: 2006 general election for Secretary of State; 2006 general  
28

1 Beyond the facts presented in the expert report of Dr. F. Arturo Rosales,  
2 Gonzalez Plaintiffs are unable to identify additional facts at this time in response to this  
3 interrogatory.  
4

5 **9. Identify each and every Latino that has been elected to public office in**  
6 **Arizona, or any political subdivision thereof, including the title of the office,**  
7 **the jurisdiction of such office, and the date of such election.**

8 Answer:

9 Gonzalez Plaintiffs are not in possession of the information sought in this  
10 interrogatory but believe that the information is publicly available.  
11

12  
13 **10. Identify each and every fact upon which you base your contention that**  
14 **elected officials of Arizona, or of any political subdivision thereof, lack**  
15 **responsiveness to the particularized needs of Latinos.**

16 Answer:

17 Without waiving any general objections and objections previously stated in  
18 response to this interrogatory, Plaintiff further objects to the interrogatory to the extent  
19 that it seeks an impermissible narrative account of Plaintiff's case and claims.  
20

21 **11. Identify each and every fact upon which you based your allegation in**  
22 **paragraph 75 of the First Amended Complaint that "Latinos, among other**  
23 **ethnic groups, are less likely to possess the forms of identification required**  
24 **under Proposition 200 to register to vote and cast a ballot."**

25 Answer:

26 Without waiving any general objections and objections previously stated in  
27 response to this interrogatory, Plaintiff further objects to the interrogatory to the extent  
28 that it seeks an impermissible narrative account of Plaintiff's case and claims.

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Plaintiff AHCF supplements its answer to the interrogatory as follows:

As noted in the supplemental response to interrogatory 1, Latinos are less likely to possess documents that satisfy the proof of citizenship requirement of Proposition 200 because, among other things, they have a lower socio-economic status when compared to non-Latinos or Anglos and comprise a greater proportion of naturalized citizens when compared to non-Latinos or Anglos in Arizona.

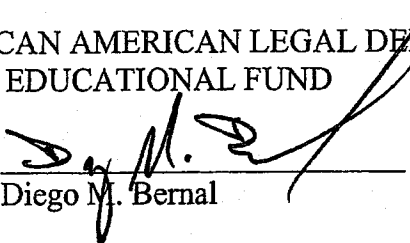
As noted in the supplemental response to interrogatory 2, Latinos are less likely to be able to satisfy the voter identification requirement of Proposition 200 because, among other things, they have a lower socio-economic status when compared to non-Latinos or Anglos.

Mr. Jesus Gonzalez does not possess a driver's license dated after October 1, 1996.

Dated: February 11, 2008

Respectfully submitted,

MEXICAN AMERICAN LEGAL DEFENSE  
AND EDUCATIONAL FUND

By:   
Diego M. Bernal

Attorneys for Plaintiffs  
Gonzalez, et al.

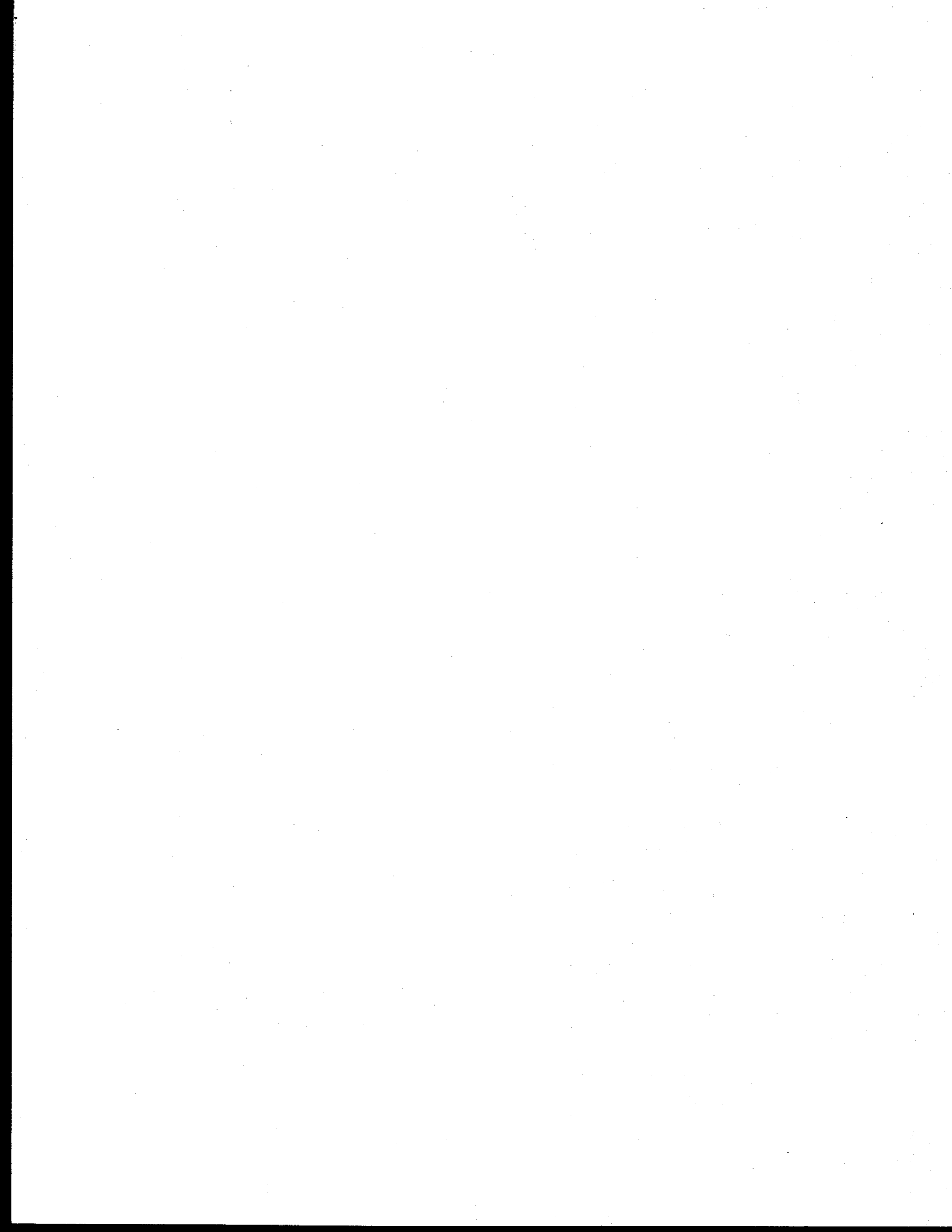
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**VERIFICATION OF ANSWERS TO INTERROGATORIES**

I, Hector Yturalde, declare, under penalty of perjury under the laws of the United States that the facts stated in the foregoing Interrogatories and Answers are true to the best of my knowledge or belief.

Hector Yturalde

**Dated: February 13, 2008**



COPY

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14 Attorneys for Gonzalez Plaintiffs

16 IN THE UNITED STATES DISTRICT COURT  
17 FOR THE DISTRICT OF ARIZONA

18 Maria M. Gonzalez, et al.,  
19 Plaintiffs,

20 vs.

21 State of Arizona, et al,  
22 Defendants.

) No. CV-06-1268-PHX-ROS(Lead)  
) No. CV-06-1362-PCT-ROS  
) No. CV-06-1575-PCT-ROS

) **SUPPLEMENTAL ANSWERS TO**  
) **DEFENDANTS STATE OF**  
) **ARIZONA AND THE ARIZONA**  
) **SECRETARY OF STATE'S**  
) **SECOND SET OF**  
) **INTERROGATORIES TO**  
) **ASSOCIATION OF**  
) **COMMUNITY**  
) **ORGANIZATIONS FOR**  
) **REFORM NOW**

(Assigned to the Honorable Roslyn  
O. Silver)

1 **1. Identify each and every fact upon which you base your contention that the**  
2 **proof of citizenship requirement of Proposition 200 has a discriminatory**  
3 **impact on Latinos in Arizona.**

4 Answer:

5 Without waiving any general objections and objections previously stated in  
6 response to this interrogatory, Plaintiff further objects to the interrogatory to the extent  
7 that it seeks an impermissible narrative account of Plaintiff's case and claims.

8 Plaintiff ACORN supplements its answer to the interrogatory as follows:

9 Latinos are less likely to be able to satisfy the proof of citizenship requirement of  
10 Proposition 200 because, among other things, they have a lower socio-economic status  
11 when compared to non-Latinos or Anglos and comprise a greater proportion of  
12 naturalized citizens when compared to non-Latinos or Anglos in Arizona.

13  
14 Latinos are less likely than non-Latinos or Anglos to cure a voter registration  
15 application that has been rejected by the County Recorder for failure to provide proof of  
16 citizenship of Proposition 200.

17  
18 Rejected voter registration forms provided by Defendants in discovery  
19 demonstrate that the proof of citizenship requirement of Proposition 200 has resulted in  
20 the rejection of a proportionally greater number of applications form Latinos than non-  
21 Latinos or Anglos.

22  
23 The statewide voter registration rolls provided by Defendants in discovery  
24 demonstrate that the proof of citizenship requirement of Proposition 200 has resulted in  
25 a proportionally smaller number of Latinos being added to the voter rolls as compared  
26 to non-Latinos or Anglos.  
27  
28

1 Mr. Jesus Gonzalez is a Latino U.S. citizen but had his voter registration  
2 applications rejected twice for failure to provide proof of citizenship required by  
3 Proposition 200.  
4

5 Mrs. Maria Gonzalez is a Latina U.S. citizen but had her voter registration  
6 application rejected for failure to provide the proof of citizenship required by  
7 Proposition 200.  
8

9 Latinos who attempt to register to vote in community-based registration  
10 campaigns are unlikely to have on their person at the time of registration the proof of  
11 citizenship required by Proposition 200.  
12

13 **2. Identify each and every fact upon which you base your contention**  
14 **that the voting identification requirement of Proposition 200 has a**  
15 **discriminatory impact on Latinos in Arizona.**

16 Answer:

17 Without waiving any general objections and objections previously stated in  
18 response to this interrogatory, Plaintiff further objects to the interrogatory to the extent  
19 that it seeks an impermissible narrative account of Plaintiff's case and claims.  
20

21 Plaintiff ACORN supplements its answer to the interrogatory as follows:

22 Latinos are less likely to be able to satisfy the voter identification requirement of  
23 Proposition 200 because, among other things, they have a lower socio-economic status  
24 when compared to non-Latinos or Anglos.  
25

26 Because most County Defendants thus far have refused to disclose the uncounted  
27 conditional provisional ballots as required by the Court's January 22, 2008 Order and  
28

1 Gonzalez Plaintiffs' subsequent subpoenas, Gonzalez Plaintiffs are unable to describe at  
2 this time how the discovery provided by Defendants relates to the facts contended by  
3 Gonzalez Plaintiffs with respect to the disparate impact of the voter identification  
4 requirements of Proposition 200.  
5

6  
7 **3. Identify each and every fact upon which you base your contention that**  
8 **Arizona, or any political subdivision thereof, has a history of official**  
9 **discrimination that touched the right of any Latinos to register, to vote, or to**  
10 **otherwise participate in democratic process.**

11 Answer:

12 Without waiving any general objections and objections previously stated in  
13 response to this interrogatory, Plaintiff further objects to the interrogatory to the extent  
14 that it seeks an impermissible narrative account of Plaintiff's case and claims.  
15

16 **4. Identify each and every fact upon which you base your contention that**  
17 **voting in the elections of the State, or any political subdivision thereof, is**  
18 **racially polarized with regard to Latinos.**

19 Answer:

20 Without waiving any general objections and objections previously stated in  
21 response to this interrogatory, Plaintiff further objects to the interrogatory to the extent  
22 that it seeks an impermissible narrative account of Plaintiff's case and claims.  
23

24 Plaintiff ACORN supplements its answer to the interrogatory as follows:

25 Latinos vote cohesively for their candidate of choice in Arizona.

26 Anglos vote as a bloc normally to defeat the Latino candidate of choice in  
27 Arizona.  
28

1 Without waiving any general objections and objections previously stated in  
2 response to this interrogatory, Plaintiff further objects to the interrogatory to the extent  
3 that it seeks an impermissible narrative account of Plaintiff's case and claims.  
4

5 Beyond the facts presented in the expert report of Dr. F. Arturo Rosales,  
6 Gonzalez Plaintiffs are unable to identify additional facts at this time in response to this  
7 interrogatory.  
8

9 **9. Identify each and every Latino that has been elected to public office in  
10 Arizona, or any political subdivision thereof, including the title of the office,  
11 the jurisdiction of such office, and the date of such election.**

12 Answer:

13 Gonzalez Plaintiffs are not in possession of the information sought in this  
14 interrogatory but believe that the information is publicly available.  
15

16 **10. Identify each and every fact upon which you base your contention that  
17 elected officials of Arizona, or of any political subdivision thereof, lack  
18 responsiveness to the particularized needs of Latinos.**

19 Answer:

20 Without waiving any general objections and objections previously stated in  
21 response to this interrogatory, Plaintiff further objects to the interrogatory to the extent  
22 that it seeks an impermissible narrative account of Plaintiff's case and claims.  
23

24 **11. Identify each and every fact upon which you based your allegation in  
25 paragraph 75 of the First Amended Complaint that "Latinos, among other  
26 ethnic groups, are less likely to possess the forms of identification required  
27 under Proposition 200 to register to vote and cast a ballot."**

28 Answer:

1  
2 Without waiving any general objections and objections previously stated in  
3 response to this interrogatory, Plaintiff further objects to the interrogatory to the extent  
4 that it seeks an impermissible narrative account of Plaintiff's case and claims.

5 Plaintiff ACORN supplements its answer to the interrogatory as follows:

6  
7 As noted in the supplemental response to interrogatory 1, Latinos are less likely  
8 to possess documents that satisfy the proof of citizenship requirement of Proposition  
9 200 because, among other things, they have a lower socio-economic status when  
10 compared to non-Latinos or Anglos and comprise a greater proportion of naturalized  
11 citizens when compared to non-Latinos or Anglos in Arizona.  
12

13 As noted in the supplemental response to interrogatory 2, Latinos are less likely  
14 to be able to satisfy the voter identification requirement of Proposition 200 because,  
15 among other things, they have a lower socio-economic status when compared to non-  
16 Latinos or Anglos.  
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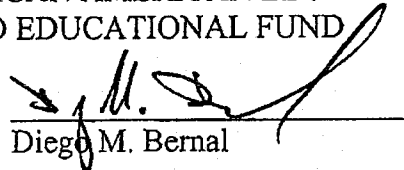
18 Mr. Jesus Gonzalez does not possess a driver's license dated after October 1,  
19 1996.  
20

21 Dated: February 11, 2008

22 Respectfully submitted,

23 MEXICAN AMERICAN LEGAL DEFENSE  
24 AND EDUCATIONAL FUND

25 By:

26   
Diego M. Bernal

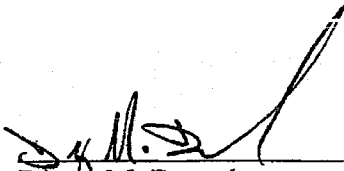
27 Attorneys for Plaintiffs  
28 Gonzalez, et al.

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CERTIFICATE OF SERVICE

I hereby certify that on the 11<sup>th</sup> day of February, 2008, I sent via electronic mail copies of the foregoing document to:

Arizona Attorney General  
Solicitor General's Office  
Attn: Barbara A. Bailey  
1275 West Washington Street  
Phoenix, AZ 85007-2926

By:   
Diego M. Bernal  
Counsel for Plaintiffs, Gonzalez, et al.

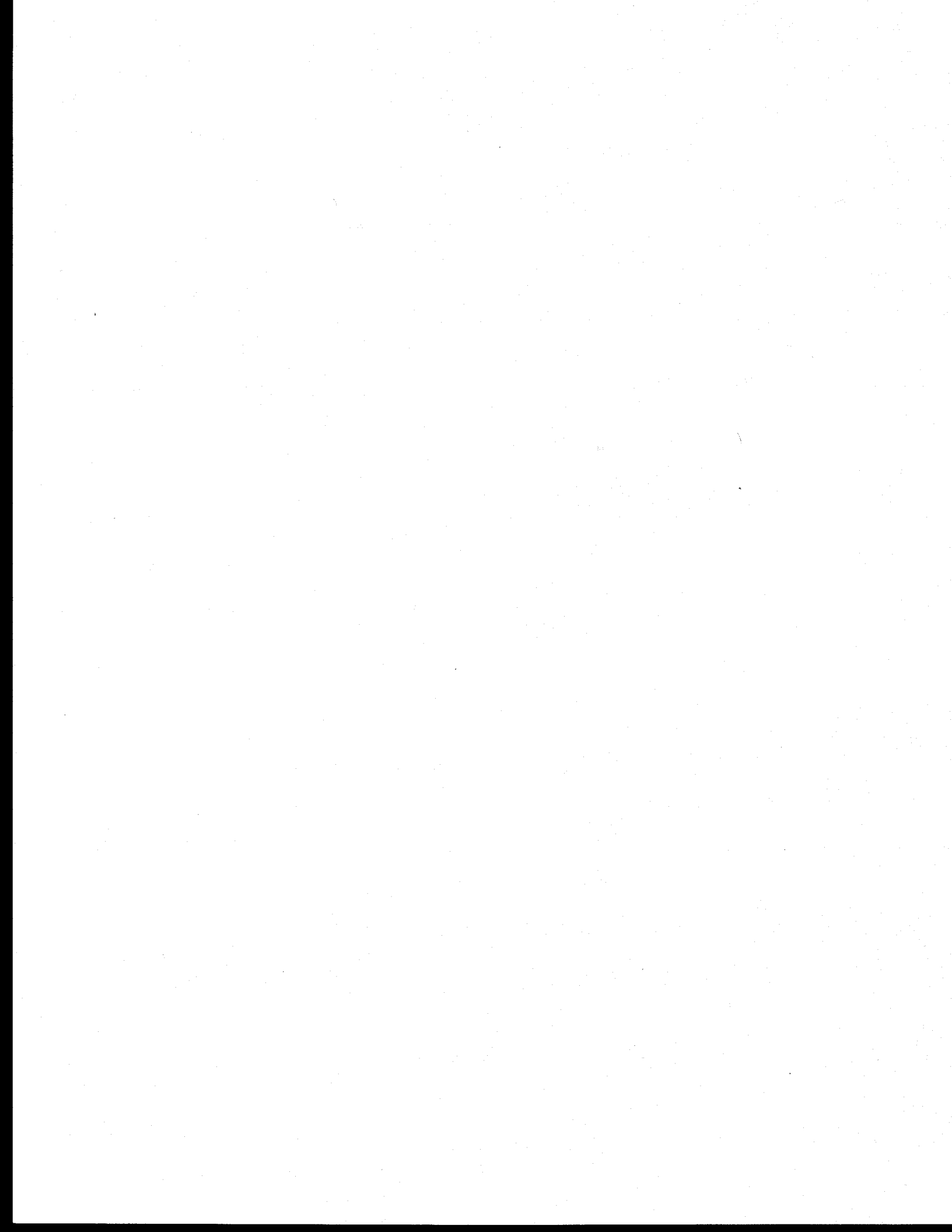
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**VERIFICATION OF ANSWERS TO INTERROGATORIES**

I, Brian Miller, declare, under penalty of perjury under the laws of the United States that the facts stated in the forgoing Interrogatories and Answers are true to the best of my knowledge or belief.

*Brian Miller*

Dated: 2/11/08



COPY

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12 Ph:(202)434-1639  
13 ksansdstrom@perkinscoie.com

14 Attorneys for Gonzalez Plaintiffs

15  
16 IN THE UNITED STATES DISTRICT COURT  
17 FOR THE DISTRICT OF ARIZONA

18 Maria M. Gonzalez, et al.,  
19 Plaintiffs,

20 vs.

21 State of Arizona, et al,  
22 Defendants.

) No. CV-06-1268-PHX-ROS(Lead)  
) No. CV-06-1362-PCT-ROS  
) No. CV-06-1575-PCT-ROS

) **SUPPLEMENTAL ANSWERS TO**  
) **DEFENDANTS STATE OF**  
) **ARIZONA AND THE ARIZONA**  
) **SECRETARY OF STATE'S**  
) **SECOND SET OF**  
) **INTERROGATORIES TO**  
) **CHICANOS POR LA CAUSA**

) (Assigned to the Honorable Roslyn  
) O. Silver  
)

1 Comes now, Plaintiff Chicanos Por La Causa (CPLC), and submit their  
2 Supplemental Answers to State Defendants' Second Set of Interrogatories.

3  
4 **GENERAL OBJECTIONS**

5 The following General Objections are applicable to and incorporated into each  
6 Interrogatory answer:

- 7 1. Plaintiff objects to each Interrogatory to the extent that it calls for trial  
8 preparation material or work product, or for information protected by the attorney-client  
9 privilege, co-party privilege; Constitutional, statutory, or common-law privacy rights, or  
10 any other recognized privilege or immunity from disclosure.
- 11 2. Plaintiff objects to each Interrogatory served by Defendant in this action to the  
12 extent that it is extensively broad, burdensome, oppressive, vague or generally  
13 unspecific as to what a full and complete answer is.
- 14 3. Plaintiff objects to the Definitions and Instructions to the extent they may  
15 purport to impose any obligation greater than that allowed by the Federal Rules of Civil  
16 Procedure.
- 17 4. Plaintiff asserts these objections without waiving or intending to waive any  
18 objections as to competence, relevance, materiality or privilege.
- 19 5. Plaintiff reserves the right to supplement these answers with subsequently  
20 obtained or discovered information.

21 Subject to and without waiving the foregoing objections, and incorporating them  
22 by reference into each of the answers provided below, Plaintiff responds to Defendant's  
23 Second Set of Interrogatories as follows:

24 **INTERROGATORIES**

- 25 1. **Identify each and every fact upon which you base your contention that the  
26 proof of citizenship requirement of Proposition 200 has a discriminatory  
27 impact on Latinos in Arizona.**

28 Answer:

1 Without waiving any general objections and objections previously stated in  
2 response to this interrogatory, Plaintiff further objects to the interrogatory to the extent  
3 that it seeks an impermissible narrative account of Plaintiff's case and claims.  
4

5 Plaintiff CPLC supplements its answer to the interrogatory as follows:

6 Latinos are less likely to be able to satisfy the proof of citizenship requirement of  
7 Proposition 200 because, among other things, they have a lower socio-economic status  
8 when compared to non-Latinos or Anglos and comprise a greater proportion of  
9 naturalized citizens when compared to non-Latinos or Anglos in Arizona.  
10

11 Latinos are less likely than non-Latinos or Anglos to cure a voter registration  
12 application that has been rejected by the County Recorder for failure to provide proof of  
13 citizenship of Proposition 200.  
14

15 Rejected voter registration forms provided by Defendants in discovery  
16 demonstrate that the proof of citizenship requirement of Proposition 200 has resulted in  
17 the rejection of a proportionally greater number of applications from Latinos than non-  
18 Latinos or Anglos.  
19

20 The statewide voter registration rolls provided by Defendants in discovery  
21 demonstrate that the proof of citizenship requirement of Proposition 200 has resulted in  
22 a proportionally smaller number of Latinos being added to the voter rolls as compared  
23 to non-Latinos or Anglos.  
24

25 Mr. Jesus Gonzalez is a Latino U.S. citizen but had his voter registration  
26 applications rejected twice for failure to provide proof of citizenship required by  
27 Proposition 200.  
28

1 Mrs. Maria Gonzalez is a Latina U.S. citizen but had her voter registration  
2 application rejected for failure to provide the proof of citizenship required by  
3 Proposition 200.  
4

5 Latinos who attempt to register to vote in community-based registration  
6 campaigns are unlikely to have on their person at the time of registration the proof of  
7 citizenship required by Proposition 200.

8 The proof of citizenship requirement of Proposition 200 has a further  
9 discriminatory impact on Latinos because it falsely stigmatizes Latinos as perpetrators  
10 of election fraud.  
11

12  
13  
14 **2. Identify each and every fact upon which you base your contention**  
15 **that the voting identification requirement of Proposition 200 has a**  
16 **discriminatory impact on Latinos in Arizona.**

17 Answer:

18 Without waiving any general objections and objections previously stated in  
19 response to this interrogatory, Plaintiff further objects to the interrogatory to the extent  
20 that it seeks an impermissible narrative account of Plaintiff's case and claims.  
21

22 Plaintiff CPLC supplements its answer to the interrogatory as follows:

23 Latinos are less likely to be able to satisfy the voter identification requirement of  
24 Proposition 200 because, among other things, they have a lower socio-economic status  
25 when compared to non-Latinos or Anglos.  
26  
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28

1           Because most County Defendants thus far have refused to disclose the uncounted  
2 conditional provisional ballots as required by the Court's January 22, 2008 Order and  
3 Gonzalez Plaintiffs' subsequent subpoenas, Gonzalez Plaintiffs are unable to describe at  
4 this time how the discovery provided by Defendants relates to the facts contended by  
5 Gonzalez Plaintiffs with respect to the disparate impact of the voter identification  
6 requirements of Proposition 200.  
7  
8

9       **3. Identify each and every fact upon which you base your contention that**  
10 **Arizona, or any political subdivision thereof, has a history of official**  
11 **discrimination that touched the right of any Latinos to register, to vote, or to**  
12 **otherwise participate in democratic process.**

13       Answer:

14       Without waiving any general objections and objections previously stated in  
15 response to this interrogatory, Plaintiff further objects to the interrogatory to the extent  
16 that it seeks an impermissible narrative account of Plaintiff's case and claims.  
17

18       **4. Identify each and every fact upon which you base your contention that**  
19 **voting in the elections of the State, or any political subdivision thereof, is**  
20 **racially polarized with regard to Latinos.**

21       Answer:

22       Without waiving any general objections and objections previously stated in  
23 response to this interrogatory, Plaintiff further objects to the interrogatory to the extent  
24 that it seeks an impermissible narrative account of Plaintiff's case and claims.  
25

26       Plaintiff CPLC supplements its answer to the interrogatory as follows:

27       Latinos vote cohesively for their candidate of choice in Arizona.  
28

1 11. Identify each and every fact upon which you based your allegation in  
2 paragraph 75 of the First Amended Complaint that “Latinos, among other  
3 ethnic groups, are less likely to possess the forms of identification required  
4 under Proposition 200 to register to vote and cast a ballot.”

5 Answer:

6 Without waiving any general objections and objections previously stated  
7 in response to this interrogatory, Plaintiff further objects to the interrogatory to the  
8 extent that it seeks an impermissible narrative account of Plaintiff’s case and claims.

9 Plaintiff CPLC supplements its answer to the interrogatory as follows:

10 As noted in the supplemental response to interrogatory 1, Latinos are less likely  
11 to possess documents that satisfy the proof of citizenship requirement of Proposition  
12 200 because, among other things, they have a lower socio-economic status when  
13 compared to non-Latinos or Anglos and comprise a greater proportion of naturalized  
14 citizens when compared to non-Latinos or Anglos in Arizona.

15  
16 As noted in the supplemental response to interrogatory 2, Latinos are less likely  
17 to be able to satisfy the voter identification requirement of Proposition 200 because,  
18 among other things, they have a lower socio-economic status when compared to non-  
19 Latinos or Anglos.  
20

21  
22 Mr. Jesus Gonzalez does not possess a driver’s license dated after October 1,  
23 1996.

24  
25 Dated: February 8, 2008

26 Respectfully submitted,

27 MEXICAN AMERICAN LEGAL DEFENSE  
28 AND EDUCATIONAL FUND

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**VERIFICATION OF ANSWERS TO INTERROGATORIES**

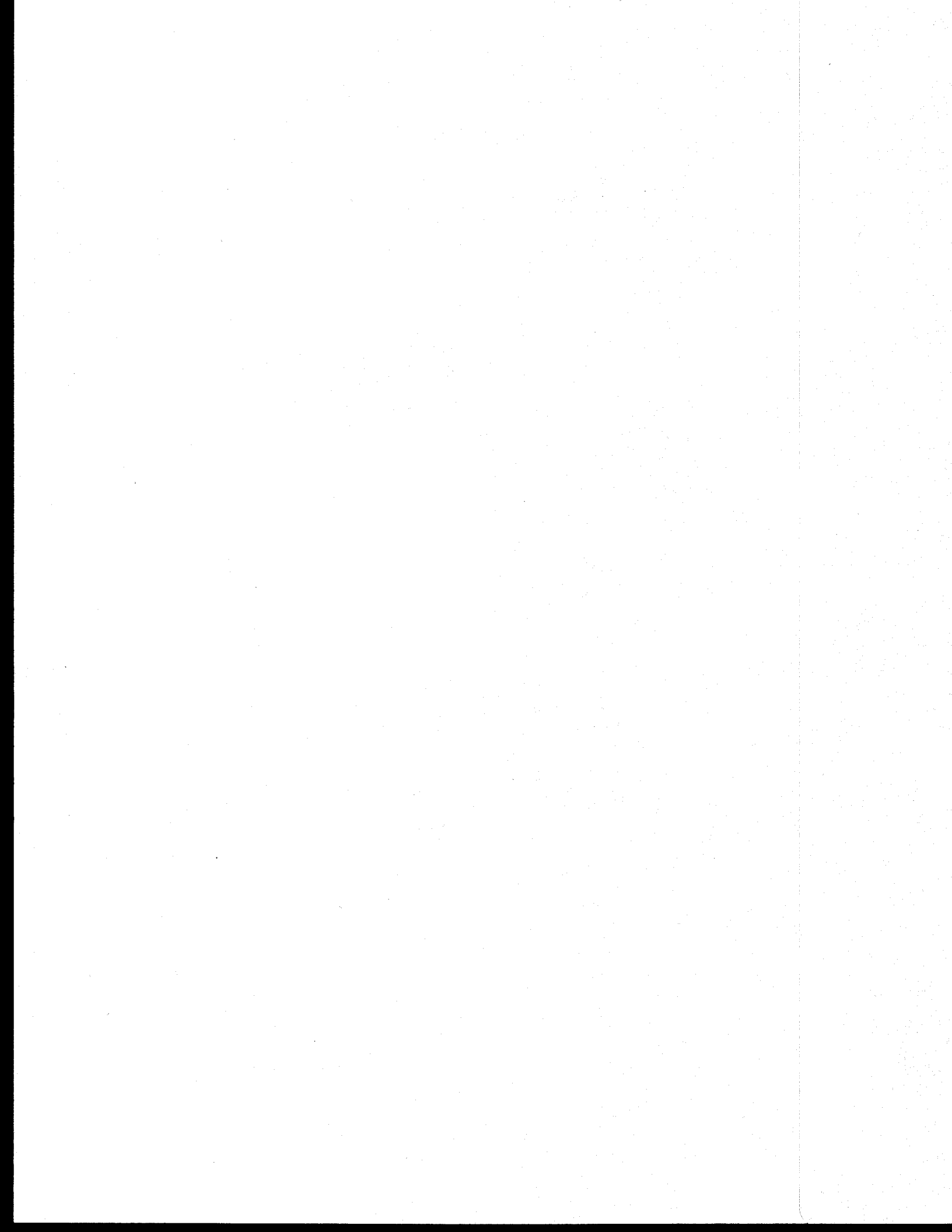
Edmundo Hidalgo

I, SAL MARTINEZ, declare, under penalty of perjury under the laws of the United States that the facts stated in the foregoing Interrogatories and Answers are true to the best of my knowledge or belief.

Dated:

2/8/08  
2/8/08

[Signature]  
S. Martinez



COPY

1 Nina Perales, TX SBN: 24005046  
2 Diego Bernal, TX SBN: 24048350  
3 MEXICAN AMERICAN LEGAL  
4 DEFENSE AND EDUCATIONAL FUND  
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9 [dbernal@maldef.org](mailto:dbernal@maldef.org)

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15 [ksansdstrom@perkinscoie.com](mailto:ksansdstrom@perkinscoie.com)

14 Attorneys for Gonzalez Plaintiffs

16 IN THE UNITED STATES DISTRICT COURT  
17 FOR THE DISTRICT OF ARIZONA

18 Maria M. Gonzalez, et al.,  
19 Plaintiffs,

20 vs.

21 State of Arizona, et al,  
22 Defendants.

) No. CV-06-1268-PHX-ROS(Lead)  
) No. CV-06-1362-PCT-ROS  
) No. CV-06-1575-PCT-ROS

) **SUPPLEMENTAL ANSWERS TO**  
) **DEFENDANTS STATE OF**  
) **ARIZONA AND THE ARIZONA**  
) **SECRETARY OF STATE'S**  
) **SECOND SET OF**  
) **INTERROGATORIES TO**  
) **COMMON CAUSE**

) (Assigned to the Honorable Roslyn  
) O. Silver)

1 Comes now, Plaintiff Common Cause, and submit their Supplemental Answers  
2 to State Defendants' Second Set of Interrogatories.

3  
4 **GENERAL OBJECTIONS**

5 The following General Objections are applicable to and incorporated into each  
6 Interrogatory answer:

7 1. Plaintiff objects to each Interrogatory to the extent that it calls for trial  
8 preparation material or work product, or for information protected by the attorney-client  
9 privilege, co-party privilege; Constitutional, statutory, or common-law privacy rights, or  
10 any other recognized privilege or immunity from disclosure.

11 2. Plaintiff objects to each Interrogatory served by Defendant in this action to the  
12 extent that it is extensively broad, burdensome, oppressive, vague or generally  
13 unspecific as to what a full and complete answer is.

14 3. Plaintiff objects to the Definitions and Instructions to the extent they may  
15 purport to impose any obligation greater than that allowed by the Federal Rules of Civil  
16 Procedure.

17 4. Plaintiff asserts these objections without waiving or intending to waive any  
18 objections as to competence, relevance, materiality or privilege.

19 5. Plaintiff reserves the right to supplement these answers with subsequently  
20 obtained or discovered information.

21 Subject to and without waiving the foregoing objections, and incorporating them  
22 by reference into each of the answers provided below, Plaintiff responds to Defendant's  
23 Second Set of Interrogatories as follows:

24 **INTERROGATORIES**

25 1. **Identify each and every fact upon which you base your contention that the  
26 proof of citizenship requirement of Proposition 200 has a discriminatory  
27 impact on Latinos in Arizona.**

28 Answer:

1 Without waiving any general objections and objections previously stated in  
2 response to this interrogatory, Plaintiff further objects to the interrogatory to the extent  
3 that it seeks an impermissible narrative account of Plaintiff's case and claims.  
4

5 Plaintiff Common Cause supplements its answer to the interrogatory as follows:

6 Latinos are less likely to be able to satisfy the proof of citizenship requirement of  
7 Proposition 200 because, among other things, they have a lower socio-economic status  
8 when compared to non-Latinos or Anglos and comprise a greater proportion of  
9 naturalized citizens when compared to non-Latinos or Anglos in Arizona.  
10

11 Latinos are less likely than non-Latinos or Anglos to cure a voter registration  
12 application that has been rejected by the County Recorder for failure to provide proof of  
13 citizenship of Proposition 200.  
14

15 Rejected voter registration forms provided by Defendants in discovery  
16 demonstrate that the proof of citizenship requirement of Proposition 200 has resulted in  
17 the rejection of a proportionally greater number of applications from Latinos than non-  
18 Latinos or Anglos.  
19

20 The statewide voter registration rolls provided by Defendants in discovery  
21 demonstrate that the proof of citizenship requirement of Proposition 200 has resulted in  
22 a proportionally smaller number of Latinos being added to the voter rolls as compared  
23 to non-Latinos or Anglos.  
24

25 Mr. Jesus Gonzalez is a Latino U.S. citizen but had his voter registration  
26 applications rejected twice for failure to provide proof of citizenship required by  
27 Proposition 200.  
28

1 Mrs. Maria Gonzalez is a Latina U.S. citizen but had her voter registration  
2 application rejected for failure to provide the proof of citizenship required by  
3 Proposition 200.  
4

5 Latinos who attempt to register to vote in community-based registration  
6 campaigns are unlikely to have on their person at the time of registration the proof of  
7 citizenship required by Proposition 200.  
8

9 **2. Identify each and every fact upon which you base your contention**  
10 **that the voting identification requirement of Proposition 200 has a**  
11 **discriminatory impact on Latinos in Arizona.**

12 Answer:

13 Without waiving any general objections and objections previously stated in  
14 response to this interrogatory, Plaintiff further objects to the interrogatory to the extent  
15 that it seeks an impermissible narrative account of Plaintiff's case and claims.  
16

17 Plaintiff Common Cause supplements its answer to the interrogatory as follows:

18 Latinos are less likely to be able to satisfy the voter identification requirement of  
19 Proposition 200 because, among other things, they have a lower socio-economic status  
20 when compared to non-Latinos or Anglos.  
21

22 Because most County Defendants thus far have refused to disclose the uncounted  
23 conditional provisional ballots as required by the Court's January 22, 2008 Order and  
24 Gonzalez Plaintiffs' subsequent subpoenas, Gonzalez Plaintiffs are unable to describe at  
25 this time how the discovery provided by Defendants relates to the facts contended by  
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1 Gonzalez Plaintiffs with respect to the disparate impact of the voter identification  
2 requirements of Proposition 200.

3  
4 **3. Identify each and every fact upon which you base your contention that**  
5 **Arizona, or any political subdivision thereof, has a history of official**  
6 **discrimination that touched the right of any Latinos to register, to vote, or to**  
7 **otherwise participate in democratic process.**

8 Answer:

9 Without waiving any general objections and objections previously stated in  
10 response to this interrogatory, Plaintiff further objects to the interrogatory to the extent  
11 that it seeks an impermissible narrative account of Plaintiff's case and claims.

12  
13 **4. Identify each and every fact upon which you base your contention that**  
14 **voting in the elections of the State, or any political subdivision thereof, is**  
15 **racially polarized with regard to Latinos.**

16 Answer:

17 Without waiving any general objections and objections previously stated in  
18 response to this interrogatory, Plaintiff further objects to the interrogatory to the extent  
19 that it seeks an impermissible narrative account of Plaintiff's case and claims.

20 Plaintiff Common Cause supplements its answer to the interrogatory as follows:

21 Latinos vote cohesively for their candidate of choice in Arizona.

22  
23 Anglos vote as a bloc normally to defeat the Latino candidate of choice in  
24 Arizona.

25  
26 Voting between Latinos and Anglos was racially polarized in the following  
27 recent Arizona elections: 2006 general election for Secretary of State; 2006 general  
28

1 Beyond the facts presented in the expert report of Dr. F. Arturo Rosales,  
2 Gonzalez Plaintiffs are unable to identify additional facts at this time in response to this  
3 interrogatory.  
4

5 **9. Identify each and every Latino that has been elected to public office in**  
6 **Arizona, or any political subdivision thereof, including the title of the office,**  
7 **the jurisdiction of such office, and the date of such election.**

8 Answer:

9 Gonzalez Plaintiffs are not in possession of the information sought in this  
10 interrogatory but believe that the information is publicly available.  
11

12  
13 **10. Identify each and every fact upon which you base your contention that**  
14 **elected officials of Arizona, or of any political subdivision thereof, lack**  
15 **responsiveness to the particularized needs of Latinos.**

16 Answer:

17 Without waiving any general objections and objections previously stated in  
18 response to this interrogatory, Plaintiff further objects to the interrogatory to the extent  
19 that it seeks an impermissible narrative account of Plaintiff's case and claims.  
20

21 **11. Identify each and every fact upon which you based your allegation in**  
22 **paragraph 75 of the First Amended Complaint that "Latinos, among other**  
23 **ethnic groups, are less likely to possess the forms of identification required**  
24 **under Proposition 200 to register to vote and cast a ballot."**

25 Answer:

26 Without waiving any general objections and objections previously stated  
27 in response to this interrogatory, Plaintiff further objects to the interrogatory to the  
28 extent that it seeks an impermissible narrative account of Plaintiff's case and claims.

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Plaintiff Common Cause supplements its answer to the interrogatory as follows:

As noted in the supplemental response to interrogatory 1, Latinos are less likely to possess documents that satisfy the proof of citizenship requirement of Proposition 200 because, among other things, they have a lower socio-economic status when compared to non-Latinos or Anglos and comprise a greater proportion of naturalized citizens when compared to non-Latinos or Anglos in Arizona.

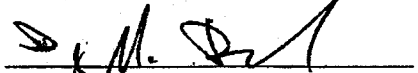
As noted in the supplemental response to interrogatory 2, Latinos are less likely to be able to satisfy the voter identification requirement of Proposition 200 because, among other things, they have a lower socio-economic status when compared to non-Latinos or Anglos.

Mr. Jesus Gonzalez does not possess a driver's license dated after October 1, 1996.

Dated: February 11, 2008

Respectfully submitted,

MEXICAN AMERICAN LEGAL DEFENSE  
AND EDUCATIONAL FUND

By:   
Diego M. Bernal

Attorneys for Plaintiffs  
Gonzalez, et al.

CERTIFICATE OF SERVICE

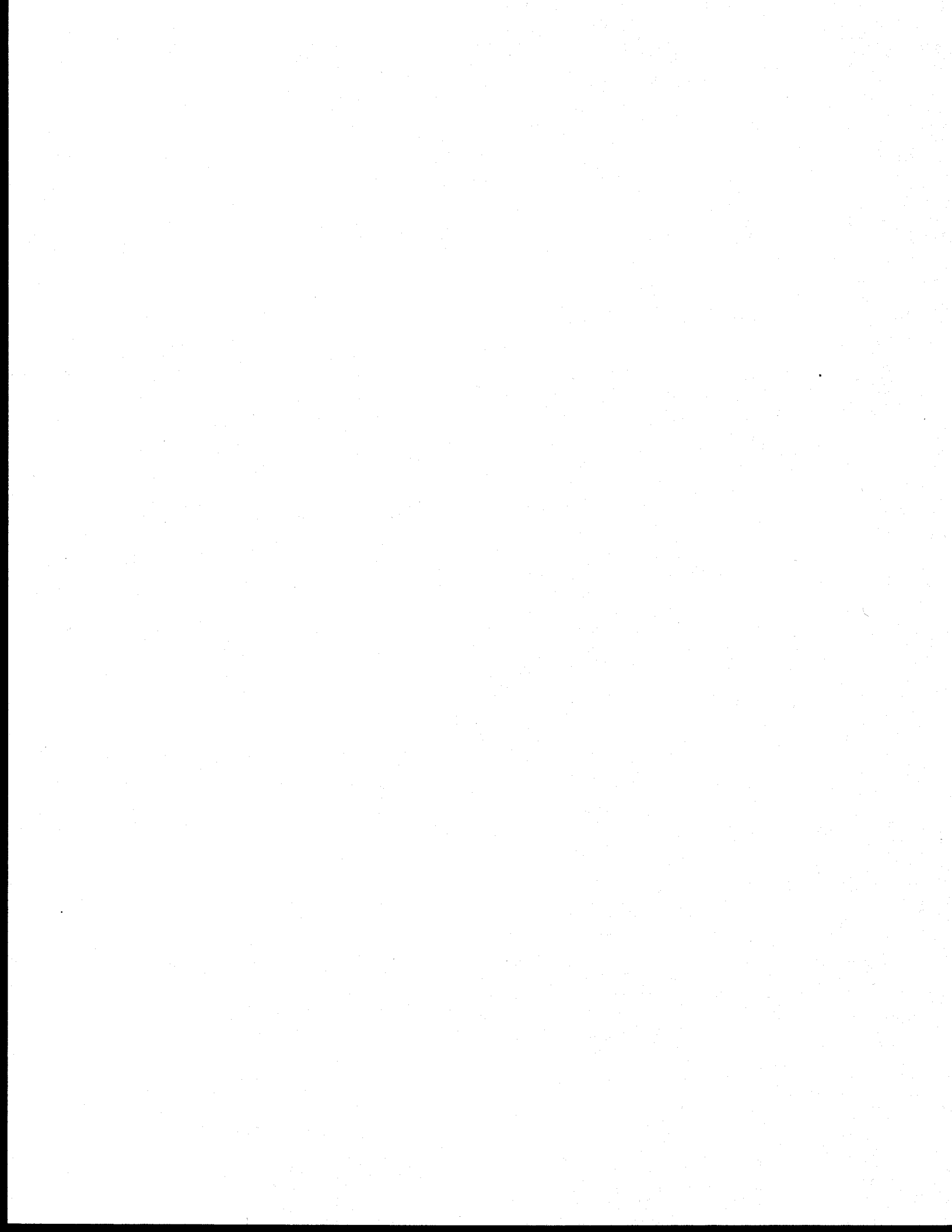
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VERIFICATION OF ANSWERS TO INTERROGATORIES

I. Arn Pearson, declare, under penalty of perjury under the laws of the United States that the facts stated in the foregoing Interrogatories and Answers are true to the best of my knowledge or belief.

Arn H Pearson

Dated: 2/11/08



COPY

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2 Diego Bernal, TX SBN: 24048350  
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14 Attorneys for Gonzalez Plaintiffs

16 IN THE UNITED STATES DISTRICT COURT  
17 FOR THE DISTRICT OF ARIZONA

18 Maria M. Gonzalez, et al., ) No. CV-06-1268-PHX-ROS(Lead)  
19 ) No. CV-06-1362-PCT-ROS  
20 Plaintiffs, ) No. CV-06-1575-PCT-ROS  
21 )  
22 vs. ) **SUPPLEMENTAL ANSWERS TO**  
23 ) **DEFENDANTS STATE OF**  
24 State of Arizona, et al, ) **ARIZONA AND THE ARIZONA**  
25 ) **SECRETARY OF STATE'S**  
26 Defendants. ) **SECOND SET OF**  
27 ) **INTERROGATORIES TO**  
28 ) **FRIENDLY HOUSE**  
)  
) (Assigned to the Honorable Roslyn  
) O. Silver  
)  
)

1 Comes now, Plaintiff Friendly House, and submit their Supplemental Answers to  
2 State Defendants' Second Set of Interrogatories.

3 **GENERAL OBJECTIONS**

4  
5 The following General Objections are applicable to and incorporated into each  
6 Interrogatory answer:

- 7 1. Plaintiff objects to each Interrogatory to the extent that it calls for trial  
8 preparation material or work product, or for information protected by the attorney-client  
9 privilege, co-party privilege; Constitutional, statutory, or common-law privacy rights, or  
10 any other recognized privilege or immunity from disclosure.
- 11 2. Plaintiff objects to each Interrogatory served by Defendant in this action to the  
12 extent that it is extensively broad, burdensome, oppressive, vague or generally  
13 unspecific as to what a full and complete answer is.
- 14 3. Plaintiff objects to the Definitions and Instructions to the extent they may  
15 purport to impose any obligation greater than that allowed by the Federal Rules of Civil  
16 Procedure.
- 17 4. Plaintiff asserts these objections without waiving or intending to waive any  
18 objections as to competence, relevance, materiality or privilege.
- 19 5. Plaintiff reserves the right to supplement these answers with subsequently  
20 obtained or discovered information.

21 Subject to and without waiving the foregoing objections, and incorporating them  
22 by reference into each of the answers provided below, Plaintiff responds to Defendant's  
23 Second Set of Interrogatories as follows:

24 **INTERROGATORIES**

- 25 1. **Identify each and every fact upon which you base your contention that the  
26 proof of citizenship requirement of Proposition 200 has a discriminatory  
27 impact on Latinos in Arizona.**

28 Answer:

1 Without waiving any general objections and objections previously stated in  
2 response to this interrogatory, Plaintiff further objects to the interrogatory to the extent  
3 that it seeks an impermissible narrative account of Plaintiff's case and claims.  
4

5 Plaintiff Friendly House supplements its answer to the interrogatory as follows:

6 Latinos are less likely to be able to satisfy the proof of citizenship requirement of  
7 Proposition 200 because, among other things, they have a lower socio-economic status  
8 when compared to non-Latinos or Anglos and comprise a greater proportion of  
9 naturalized citizens when compared to non-Latinos or Anglos in Arizona.  
10

11 Latinos are less likely than non-Latinos or Anglos to cure a voter registration  
12 application that has been rejected by the County Recorder for failure to provide proof of  
13 citizenship of Proposition 200.  
14

15 Rejected voter registration forms provided by Defendants in discovery  
16 demonstrate that the proof of citizenship requirement of Proposition 200 has resulted in  
17 the rejection of a proportionally greater number of applications from Latinos than non-  
18 Latinos or Anglos.  
19

20 The statewide voter registration rolls provided by Defendants in discovery  
21 demonstrate that the proof of citizenship requirement of Proposition 200 has resulted in  
22 a proportionally smaller number of Latinos being added to the voter rolls as compared  
23 to non-Latinos or Anglos.  
24

25 Mr. Jesus Gonzalez is a Latino U.S. citizen but had his voter registration  
26 applications rejected twice for failure to provide proof of citizenship required by  
27 Proposition 200.  
28

1 Mrs. Maria Gonzalez is a Latina U.S. citizen but had her voter registration  
2 application rejected for failure to provide the proof of citizenship required by  
3 Proposition 200.  
4

5 Latinos who attempt to register to vote in community-based registration  
6 campaigns are unlikely to have on their person at the time of registration the proof of  
7 citizenship required by Proposition 200.  
8

9 **2. Identify each and every fact upon which you base your contention**  
10 **that the voting identification requirement of Proposition 200 has a**  
11 **discriminatory impact on Latinos in Arizona.**

12 Answer:

13 Without waiving any general objections and objections previously stated in  
14 response to this interrogatory, Plaintiff further objects to the interrogatory to the extent  
15 that it seeks an impermissible narrative account of Plaintiff's case and claims.  
16

17 Plaintiff Friendly House supplements its answer to the interrogatory as follows:

18 Latinos are less likely to be able to satisfy the voter identification requirement of  
19 Proposition 200 because, among other things, they have a lower socio-economic status  
20 when compared to non-Latinos or Anglos.  
21

22 Because most County Defendants thus far have refused to disclose the uncounted  
23 conditional provisional ballots as required by the Court's January 22, 2008 Order and  
24 Gonzalez Plaintiffs' subsequent subpoenas, Gonzalez Plaintiffs are unable to describe at  
25 this time how the discovery provided by Defendants relates to the facts contended by  
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1 Gonzalez Plaintiffs with respect to the disparate impact of the voter identification  
2 requirements of Proposition 200.

3  
4 **3. Identify each and every fact upon which you base your contention that**  
5 **Arizona, or any political subdivision thereof, has a history of official**  
6 **discrimination that touched the right of any Latinos to register, to vote, or to**  
7 **otherwise participate in democratic process.**

8 Answer:

9 Without waiving any general objections and objections previously stated in  
10 response to this interrogatory, Plaintiff further objects to the interrogatory to the extent  
11 that it seeks an impermissible narrative account of Plaintiff's case and claims.

12  
13 **4. Identify each and every fact upon which you base your contention that**  
14 **voting in the elections of the State, or any political subdivision thereof, is**  
15 **racially polarized with regard to Latinos.**

16 Answer:

17 Without waiving any general objections and objections previously stated in  
18 response to this interrogatory, Plaintiff further objects to the interrogatory to the extent  
19 that it seeks an impermissible narrative account of Plaintiff's case and claims.

20  
21 Plaintiff Friendly House supplements its answer to the interrogatory as follows:

22 Latinos vote cohesively for their candidate of choice in Arizona.

23  
24 Anglos vote as a bloc normally to defeat the Latino candidate of choice in  
25 Arizona.

26 Voting between Latinos and Anglos was racially polarized in the following  
27 recent Arizona elections: 2006 general election for Secretary of State; 2006 general  
28

1 Beyond the facts presented in the expert report of Dr. F. Arturo Rosales,  
2 Gonzalez Plaintiffs are unable to identify additional facts at this time in response to this  
3 interrogatory.  
4

5 **9. Identify each and every Latino that has been elected to public office in**  
6 **Arizona, or any political subdivision thereof, including the title of the office,**  
7 **the jurisdiction of such office, and the date of such election.**

8 Answer:

9 Gonzalez Plaintiffs are not in possession of the information sought in this  
10 interrogatory but believe that the information is publicly available.  
11

12  
13 **10. Identify each and every fact upon which you base your contention that**  
14 **elected officials of Arizona, or of any political subdivision thereof, lack**  
15 **responsiveness to the particularized needs of Latinos.**

16 Answer:

17 Without waiving any general objections and objections previously stated in  
18 response to this interrogatory, Plaintiff further objects to the interrogatory to the extent  
19 that it seeks an impermissible narrative account of Plaintiff's case and claims.  
20

21 **11. Identify each and every fact upon which you based your allegation in**  
22 **paragraph 75 of the First Amended Complaint that "Latinos, among other**  
23 **ethnic groups, are less likely to possess the forms of identification required**  
24 **under Proposition 200 to register to vote and cast a ballot."**

25 Answer:

26 Without waiving any general objections and objections previously stated in  
27 response to this interrogatory, Plaintiff further objects to the interrogatory to the extent  
28 that it seeks an impermissible narrative account of Plaintiff's case and claims.

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Plaintiff Friendly House supplements its answer to the interrogatory as follows:

As noted in the supplemental response to interrogatory 1, Latinos are less likely to possess documents that satisfy the proof of citizenship requirement of Proposition 200 because, among other things, they have a lower socio-economic status when compared to non-Latinos or Anglos and comprise a greater proportion of naturalized citizens when compared to non-Latinos or Anglos in Arizona.


As noted in the supplemental response to interrogatory 2, Latinos are less likely to be able to satisfy the voter identification requirement of Proposition 200 because, among other things, they have a lower socio-economic status when compared to non-Latinos or Anglos.

Mr. Jesus Gonzalez does not possess a driver's license dated after October 1, 1996.

Dated: February 11, 2008

Respectfully submitted,

MEXICAN AMERICAN LEGAL DEFENSE  
AND EDUCATIONAL FUND

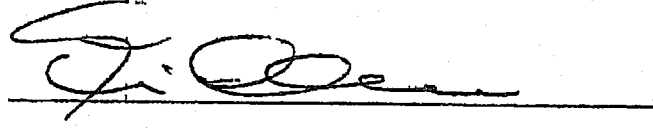
By:   
Diego M. Bernal

Attorneys for Plaintiffs  
Gonzalez, et al.

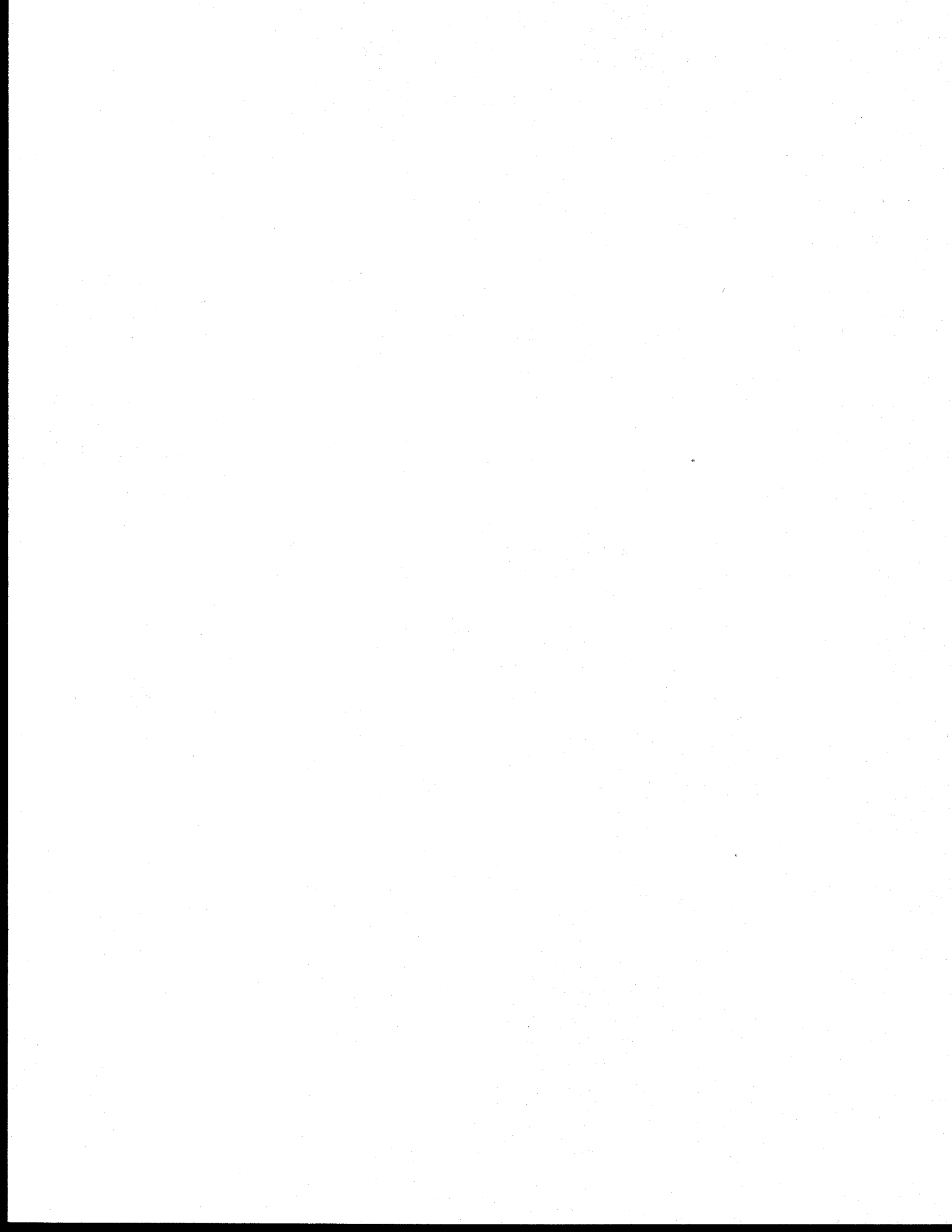
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VERIFICATION OF ANSWERS TO INTERROGATORIES

I, Luis IBARRA, declare, under penalty of perjury under the laws of the United States that the facts stated in the foregoing Interrogatories and Answers are true to the best of my knowledge or belief.

  
\_\_\_\_\_

Dated: 2/11/08



COPY

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2 Diego Bernal, TX SBN: 24048350  
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14 Ph:(202)434-1639  
15 [ksansdstrom@perkinscoie.com](mailto:ksansdstrom@perkinscoie.com)

14 Attorneys for Gonzalez Plaintiffs

16 IN THE UNITED STATES DISTRICT COURT  
17 FOR THE DISTRICT OF ARIZONA

18 Maria M. Gonzalez, et al.,  
19 Plaintiffs,

20 vs.

21 State of Arizona, et al,  
22 Defendants.

) No. CV-06-1268-PHX-ROS(Lead)  
) No. CV-06-1362-PCT-ROS  
) No. CV-06-1575-PCT-ROS

) **SUPPLEMENTAL ANSWERS TO**  
) **DEFENDANTS STATE OF**  
) **ARIZONA AND THE ARIZONA**  
) **SECRETARY OF STATE'S**  
) **SECOND SET OF**  
) **INTERROGATORIES TO**  
) **PROJECT VOTE**

) (Assigned to the Honorable Roslyn  
) O. Silver)

1 Comes now, Plaintiff Project Vote, and submit their Supplemental Answers to  
2 State Defendants' Second Set of Interrogatories.

3  
4 **GENERAL OBJECTIONS**

5 The following General Objections are applicable to and incorporated into each  
6 Interrogatory answer:

7 1. Plaintiff objects to each Interrogatory to the extent that it calls for trial  
8 preparation material or work product, or for information protected by the attorney-client  
9 privilege, co-party privilege; Constitutional, statutory, or common-law privacy rights, or  
10 any other recognized privilege or immunity from disclosure.

11 2. Plaintiff objects to each Interrogatory served by Defendant in this action to the  
12 extent that it is extensively broad, burdensome, oppressive, vague or generally  
13 unspecific as to what a full and complete answer is.

14 3. Plaintiff objects to the Definitions and Instructions to the extent they may  
15 purport to impose any obligation greater than that allowed by the Federal Rules of Civil  
16 Procedure.

17 4. Plaintiff asserts these objections without waiving or intending to waive any  
18 objections as to competence, relevance, materiality or privilege.

19 5. Plaintiff reserves the right to supplement these answers with subsequently  
20 obtained or discovered information.

21 Subject to and without waiving the foregoing objections, and incorporating them  
22 by reference into each of the answers provided below, Plaintiff responds to Defendant's  
23 Second Set of Interrogatories as follows:

24 **INTERROGATORIES**

25 1. **Identify each and every fact upon which you base your contention that the  
26 proof of citizenship requirement of Proposition 200 has a discriminatory  
27 impact on Latinos in Arizona.**

28 Answer:

1 Without waiving any general objections and objections previously stated in  
2 response to this interrogatory, Plaintiff further objects to the interrogatory to the extent  
3 that it seeks an impermissible narrative account of Plaintiff's case and claims.  
4

5 Plaintiff Project Vote supplements its answer to the interrogatory as follows:

6 Latinos are less likely to be able to satisfy the proof of citizenship requirement of  
7 Proposition 200 because, among other things, they have a lower socio-economic status  
8 when compared to non-Latinos or Anglos and comprise a greater proportion of  
9 naturalized citizens when compared to non-Latinos or Anglos in Arizona.  
10

11 Latinos are less likely than non-Latinos or Anglos to cure a voter registration  
12 application that has been rejected by the County Recorder for failure to provide proof of  
13 citizenship of Proposition 200.  
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15 Rejected voter registration forms provided by Defendants in discovery  
16 demonstrate that the proof of citizenship requirement of Proposition 200 has resulted in  
17 the rejection of a proportionally greater number of applications form Latinos than non-  
18 Latinos or Anglos.  
19

20 The statewide voter registration rolls provided by Defendants in discovery  
21 demonstrate that the proof of citizenship requirement of Proposition 200 has resulted in  
22 a proportionally smaller number of Latinos being added to the voter rolls as compared  
23 to non-Latinos or Anglos.  
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25 Mr. Jesus Gonzalez is a Latino U.S. citizen but had his voter registration  
26 applications rejected twice for failure to the provide proof of citizenship required by  
27 Proposition 200.  
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1 Mrs. Maria Gonzalez is a Latina U.S. citizen but had her voter registration  
2 application rejected for failure to provide the proof of citizenship required by  
3 Proposition 200.  
4

5 Latinos who attempt to register to vote in community-based registration  
6 campaigns are unlikely to have on their person at the time of registration the proof of  
7 citizenship required by Proposition 200.  
8

9 **2. Identify each and every fact upon which you base your contention**  
10 **that the voting identification requirement of Proposition 200 has a**  
11 **discriminatory impact on Latinos in Arizona.**

12 Answer:

13 Without waiving any general objections and objections previously stated in  
14 response to this interrogatory, Plaintiff further objects to the interrogatory to the extent  
15 that it seeks an impermissible narrative account of Plaintiff's case and claims.  
16

17 Plaintiff Project Vote supplements its answer to the interrogatory as follows:

18 Latinos are less likely to be able to satisfy the voter identification requirement of  
19 Proposition 200 because, among other things, they have a lower socio-economic status  
20 when compared to non-Latinos or Anglos.  
21

22 Because most County Defendants thus far have refused to disclose the uncounted  
23 conditional provisional ballots as required by the Court's January 22, 2008 Order and  
24 Gonzalez Plaintiffs' subsequent subpoenas, Gonzalez Plaintiffs are unable to describe at  
25 this time how the discovery provided by Defendants relates to the facts contended by  
26  
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1 Gonzalez Plaintiffs with respect to the disparate impact of the voter identification  
2 requirements of Proposition 200.

3  
4 **3. Identify each and every fact upon which you base your contention that**  
5 **Arizona, or any political subdivision thereof, has a history of official**  
6 **discrimination that touched the right of any Latinos to register, to vote, or to**  
7 **otherwise participate in democratic process.**

8 Answer:

9 Without waiving any general objections and objections previously stated in  
10 response to this interrogatory, Plaintiff further objects to the interrogatory to the extent  
11 that it seeks an impermissible narrative account of Plaintiff's case and claims.

12  
13 **4. Identify each and every fact upon which you base your contention that**  
14 **voting in the elections of the State, or any political subdivision thereof, is**  
15 **racially polarized with regard to Latinos.**

16 Answer:

17 Without waiving any general objections and objections previously stated in  
18 response to this interrogatory, Plaintiff further objects to the interrogatory to the extent  
19 that it seeks an impermissible narrative account of Plaintiff's case and claims.

20 Plaintiff Project Vote supplements its answer to the interrogatory as follows:

21 Latinos vote cohesively for their candidate of choice in Arizona.

22  
23 Anglos vote as a bloc normally to defeat the Latino candidate of choice in  
24 Arizona.

25  
26 Voting between Latinos and Anglos was racially polarized in the following  
27 recent Arizona elections: 2006 general election for Secretary of State; 2006 general  
28

1 Beyond the facts presented in the expert report of Dr. F. Arturo Rosales,  
2 Gonzalez Plaintiffs are unable to identify additional facts at this time in response to this  
3 interrogatory.  
4

5 **9. Identify each and every Latino that has been elected to public office in**  
6 **Arizona, or any political subdivision thereof, including the title of the office,**  
7 **the jurisdiction of such office, and the date of such election.**

8 Answer:

9 Gonzalez Plaintiffs are not in possession of the information sought in this  
10 interrogatory but believe that the information is publicly available.  
11

12  
13 **10. Identify each and every fact upon which you base your contention that**  
14 **elected officials of Arizona, or of any political subdivision thereof, lack**  
15 **responsiveness to the particularized needs of Latinos.**

16 Answer:

17 Without waiving any general objections and objections previously stated in  
18 response to this interrogatory, Plaintiff further objects to the interrogatory to the extent  
19 that it seeks an impermissible narrative account of Plaintiff's case and claims.  
20

21 **11. Identify each and every fact upon which you based your allegation in**  
22 **paragraph 75 of the First Amended Complaint that "Latinos, among other**  
23 **ethnic groups, are less likely to possess the forms of identification required**  
24 **under Proposition 200 to register to vote and cast a ballot."**

25 Answer:

26 Without waiving any general objections and objections previously stated in  
27 response to this interrogatory, Plaintiff further objects to the interrogatory to the extent  
28 that it seeks an impermissible narrative account of Plaintiff's case and claims.

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Plaintiff Project Vote supplements its answer to the interrogatory as follows:

As noted in the supplemental response to interrogatory 1, Latinos are less likely to possess documents that satisfy the proof of citizenship requirement of Proposition 200 because, among other things, they have a lower socio-economic status when compared to non-Latinos or Anglos and comprise a greater proportion of naturalized citizens when compared to non-Latinos or Anglos in Arizona.

As noted in the supplemental response to interrogatory 2, Latinos are less likely to be able to satisfy the voter identification requirement of Proposition 200 because, among other things, they have a lower socio-economic status when compared to non-Latinos or Anglos.

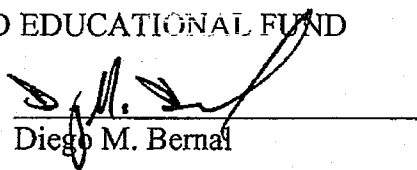
Mr. Jesus Gonzalez does not possess a driver's license dated after October 1, 1996.

Dated: February 11, 2008

Respectfully submitted,

MEXICAN AMERICAN LEGAL DEFENSE  
AND EDUCATIONAL FUND

By:



Diego M. Bernal

Attorneys for Plaintiffs  
Gonzalez, et al.

CERTIFICATE OF SERVICE

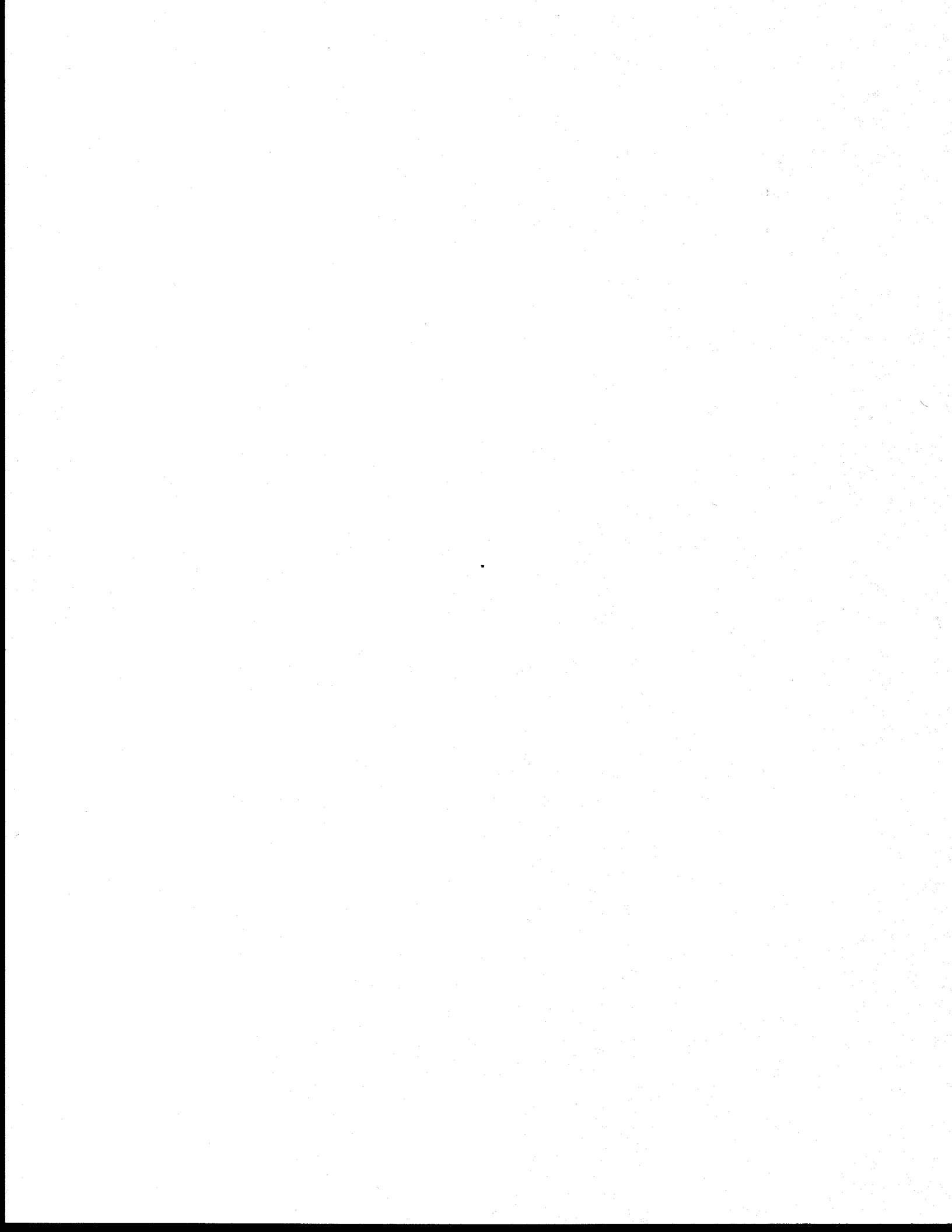
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VERIFICATION OF ANSWERS TO INTERROGATORIES

I, Brian Miller, declare, under penalty of perjury under the laws of the United States that the facts stated in the foregoing Interrogatories and Answers are true to the best of my knowledge or belief.

*Brian Miller*

Dated: 2/11/08



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14 Attorneys for Gonzalez Plaintiffs

16 IN THE UNITED STATES DISTRICT COURT  
17 FOR THE DISTRICT OF ARIZONA

18 Maria M. Gonzalez, et al., ) No. CV-06-1268-PHX-ROS(Lead)  
19 ) No. CV-06-1362-PCT-ROS  
20 Plaintiffs, ) No. CV-06-1575-PCT-ROS  
21 )

21 vs. ) **SUPPLEMENTAL ANSWERS TO**  
22 ) **DEFENDANTS STATE OF**  
23 State of Arizona, et al, ) **ARIZONA AND THE ARIZONA**  
24 ) **SECRETARY OF STATE'S**  
25 Defendants. ) **SECOND SET OF**  
26 ) **INTERROGATORIES TO**  
27 ) **SOUTHWEST VOTER**  
28 ) **REGISTRATION AND**  
 ) **EDUCATION PROJECT**

) (Assigned to the Honorable Roslyn  
O. Silver)

1 1. Identify each and every fact upon which you base your contention that the  
2 proof of citizenship requirement of Proposition 200 has a discriminatory  
3 impact on Latinos in Arizona.

4 Answer:

5 Without waiving any general objections and objections previously stated in  
6 response to this interrogatory, Plaintiff further objects to the interrogatory to the extent  
7 that it seeks an impermissible narrative account of Plaintiff's case and claims.

8 Plaintiff SVREP supplements its answer to the interrogatory as follows:

9 Latinos are less likely to be able to satisfy the proof of citizenship requirement of  
10 Proposition 200 because, among other things, they have a lower socio-economic status  
11 when compared to non-Latinos or Anglos and comprise a greater proportion of  
12 naturalized citizens when compared to non-Latinos or Anglos in Arizona.

14 Latinos are less likely than non-Latinos or Anglos to cure a voter registration  
15 application that has been rejected by the County Recorder for failure to provide proof of  
16 citizenship of Proposition 200.

18 Rejected voter registration forms provided by Defendants in discovery  
19 demonstrate that the proof of citizenship requirement of Proposition 200 has resulted in  
20 the rejection of a proportionally greater number of applications from Latinos than non-  
21 Latinos or Anglos.

23 The statewide voter registration rolls provided by Defendants in discovery  
24 demonstrate that the proof of citizenship requirement of Proposition 200 has resulted in  
25 a proportionally smaller number of Latinos being added to the voter rolls as compared  
26 to non-Latinos or Anglos.

1 Mr. Jesus Gonzalez is a Latino U.S. citizen but had his voter registration  
2 applications rejected twice for failure to provide proof of citizenship required by  
3 Proposition 200.  
4

5 Mrs. Maria Gonzalez is a Latina U.S. citizen but had her voter registration  
6 application rejected for failure to provide the proof of citizenship required by  
7 Proposition 200.  
8

9 Latinos who attempt to register to vote in community-based registration  
10 campaigns are unlikely to have on their person at the time of registration the proof of  
11 citizenship required by Proposition 200.  
12

13 **2. Identify each and every fact upon which you base your contention**  
14 **that the voting identification requirement of Proposition 200 has a**  
15 **discriminatory impact on Latinos in Arizona.**

16 Answer:

17 Without waiving any general objections and objections previously stated in  
18 response to this interrogatory, Plaintiff further objects to the interrogatory to the extent  
19 that it seeks an impermissible narrative account of Plaintiff's case and claims.  
20

21 Plaintiff SVREP supplements its answer to the interrogatory as follows:

22 Latinos are less likely to be able to satisfy the voter identification requirement of  
23 Proposition 200 because, among other things, they have a lower socio-economic status  
24 when compared to non-Latinos or Anglos.  
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1 In SVREP's extensive experience registering voters over the last 33 years, it is  
2 rare for a voter to have his or her naturalization, passport or birth certificate on hand  
3 when they attempt to register to vote.  
4

5 Because most County Defendants thus far have refused to disclose the uncounted  
6 conditional provisional ballots as required by the Court's January 22, 2008 Order and  
7 Gonzalez Plaintiffs' subsequent subpoenas, Gonzalez Plaintiffs are unable to describe at  
8 this time how the discovery provided by Defendants relates to the facts contended by  
9 Gonzalez Plaintiffs with respect to the disparate impact of the voter identification  
10 requirements of Proposition 200.  
11

12  
13 **3. Identify each and every fact upon which you base your contention that**  
14 **Arizona, or any political subdivision thereof, has a history of official**  
15 **discrimination that touched the right of any Latinos to register, to vote, or to**  
16 **otherwise participate in democratic process.**

17 Answer:

18 Without waiving any general objections and objections previously stated in  
19 response to this interrogatory, Plaintiff further objects to the interrogatory to the extent  
20 that it seeks an impermissible narrative account of Plaintiff's case and claims.  
21

22 **4. Identify each and every fact upon which you base your contention that**  
23 **voting in the elections of the State, or any political subdivision thereof, is**  
24 **racially polarized with regard to Latinos.**

25 Answer:  
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Answer:

Without waiving any general objections and objections previously stated in response to this interrogatory, Plaintiff further objects to the interrogatory to the extent that it seeks an impermissible narrative account of Plaintiff's case and claims.

**11. Identify each and every fact upon which you based your allegation in paragraph 75 of the First Amended Complaint that "Latinos, among other ethnic groups, are less likely to possess the forms of identification required under Proposition 200 to register to vote and cast a ballot."**

Answer:

Without waiving any general objections and objections previously stated in response to this interrogatory, Plaintiff further objects to the interrogatory to the extent that it seeks an impermissible narrative account of Plaintiff's case and claims.

Plaintiff SVREP supplements its answer to the interrogatory as follows:

As noted in the supplemental response to interrogatory 1, Latinos are less likely to possess documents that satisfy the proof of citizenship requirement of Proposition 200 because, among other things, they have a lower socio-economic status when compared to non-Latinos or Anglos and comprise a greater proportion of naturalized citizens when compared to non-Latinos or Anglos in Arizona.

In SVREP's extensive experience registering voters over the last 33 years, it is rare for a voter to have his or her naturalization, passport or birth certificate on hand when they attempt to register to vote.

As noted in the supplemental response to interrogatory 2, Latinos are less likely to be able to satisfy the voter identification requirement of Proposition 200 because,

1 among other things, they have a lower socio-economic status when compared to non-  
2 Latinos or Anglos.

3 Mr. Jesus Gonzalez does not possess a driver's license dated after October 1,  
4 1996.  
5

6  
7 Dated: February 8, 2008

8 Respectfully submitted,

9 MEXICAN AMERICAN LEGAL DEFENSE  
10 AND EDUCATIONAL FUND

11 By:

  
12 Diego M. Bernal

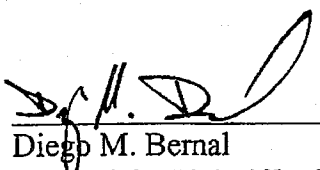
13 Attorneys for Plaintiffs  
14 Gonzalez, et al.

15  
16  
17 CERTIFICATE OF SERVICE

18 I hereby certify that on the 10<sup>th</sup> day of February, 2008, I sent via electronic mail  
19 copies of the foregoing document to:

20 Arizona Attorney General  
21 Solicitor General's Office  
22 Attn: Barbara A. Bailey  
23 1275 West Washington Street  
24 Phoenix, AZ 85007-2926

25 By:

  
26 Diego M. Bernal

27 Counsel for Plaintiffs, Gonzalez, et al.  
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VERIFICATION OF ANSWERS TO INTERROGATORIES

I, Antonio Gonzalez, declare, under penalty of perjury under the laws of the United States that the facts stated in the foregoing Interrogatories and Answers

Dated: 2/5/08 Antonio Gonzalez



COPY

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14 Attorneys for Gonzalez Plaintiffs

16 IN THE UNITED STATES DISTRICT COURT  
17 FOR THE DISTRICT OF ARIZONA

18 Maria M. Gonzalez, et al.,  
19 Plaintiffs,

20 vs.

21 State of Arizona, et al,  
22 Defendants.

) No. CV-06-1268-PHX-ROS(Lead)  
) No. CV-06-1362-PCT-ROS  
) No. CV-06-1575-PCT-ROS

) **SUPPLEMENTAL ANSWERS TO**  
) **DEFENDANTS STATE OF**  
) **ARIZONA AND THE ARIZONA**  
) **SECRETARY OF STATE'S**  
) **SECOND SET OF**  
) **INTERROGATORIES TO VALLE**  
) **DEL SOL**

) (Assigned to the  
) Honorable Roslyn O. Silver)  
)  
)  
)

1 Comes now, Plaintiff Valle Del Sol, and submit their Supplemental Answers to  
2 State Defendants' Second Set of Interrogatories.

3  
4 **GENERAL OBJECTIONS**

5 The following General Objections are applicable to and incorporated into each  
6 Interrogatory answer:

7 1. Plaintiff objects to each Interrogatory to the extent that it calls for trial  
8 preparation material or work product, or for information protected by the attorney-client  
9 privilege, co-party privilege; Constitutional, statutory, or common-law privacy rights, or  
10 any other recognized privilege or immunity from disclosure.

11 2. Plaintiff objects to each Interrogatory served by Defendant in this action to the  
12 extent that it is extensively broad, burdensome, oppressive, vague or generally  
13 unspecified as to what a full and complete answer is.

14 3. Plaintiff objects to the Definitions and Instructions to the extent they may  
15 purport to impose any obligation greater than that allowed by the Federal Rules of Civil  
16 Procedure.

17 4. Plaintiff asserts these objections without waiving or intending to waive any  
18 objections as to competence, relevance, materiality or privilege.

19 5. Plaintiff reserves the right to supplement these answers with subsequently  
20 obtained or discovered information.

21 Subject to and without waiving the foregoing objections, and incorporating them  
22 by reference into each of the answers provided below, Plaintiff responds to Defendant's  
23 Second Set of Interrogatories as follows:

24 **INTERROGATORIES**

25 1. **Identify each and every fact upon which you base your contention that the  
26 proof of citizenship requirement of Proposition 200 has a discriminatory  
27 impact on Latinos in Arizona.**

28 Answer:

1 Without waiving any general objections and objections previously stated in  
2 response to this interrogatory, Plaintiff further objects to the interrogatory to the extent  
3 that it seeks an impermissible narrative account of Plaintiff's case and claims.  
4

5 Plaintiff Valle Del Sol supplements its answer to the interrogatory as follows:

6 Latinos are less likely to be able to satisfy the proof of citizenship requirement of  
7 Proposition 200 because, among other things, they have a lower socio-economic status  
8 when compared to non-Latinos or Anglos and comprise a greater proportion of  
9 naturalized citizens when compared to non-Latinos or Anglos in Arizona.  
10

11 Latinos are less likely than non-Latinos or Anglos to cure a voter registration  
12 application that has been rejected by the County Recorder for failure to provide proof of  
13 citizenship of Proposition 200.  
14

15 Rejected voter registration forms provided by Defendants in discovery  
16 demonstrate that the proof of citizenship requirement of Proposition 200 has resulted in  
17 the rejection of a proportionally greater number of applications form Latinos than non-  
18 Latinos or Anglos.  
19

20 The statewide voter registration rolls provided by Defendants in discovery  
21 demonstrate that the proof of citizenship requirement of Proposition 200 has resulted in  
22 a proportionally smaller number of Latinos being added to the voter rolls as compared  
23 to non-Latinos or Anglos.  
24

25 Mr. Jesus Gonzalez is a Latino U.S. citizen but had his voter registration  
26 applications rejected twice for failure to the provide proof of citizenship required by  
27 Proposition 200.  
28

1 Mrs. Maria Gonzalez is a Latina U.S. citizen but had her voter registration  
2 application rejected for failure to provide the proof of citizenship required by  
3 Proposition 200.  
4

5 Latinos who attempt to register to vote in community-based registration  
6 campaigns are unlikely to have on their person at the time of registration the proof of  
7 citizenship required by Proposition 200.  
8

9 **2. Identify each and every fact upon which you base your contention**  
10 **that the voting identification requirement of Proposition 200 has a**  
11 **discriminatory impact on Latinos in Arizona.**

12 Answer:

13 Without waiving any general objections and objections previously stated in  
14 response to this interrogatory, Plaintiff further objects to the interrogatory to the extent  
15 that it seeks an impermissible narrative account of Plaintiff's case and claims.  
16

17 Plaintiff Valle Del Sol supplements its answer to the interrogatory as follows:

18 Latinos are less likely to be able to satisfy the voter identification requirement of  
19 Proposition 200 because, among other things, they have a lower socio-economic status  
20 when compared to non-Latinos or Anglos.  
21

22 Because most County Defendants thus far have refused to disclose the uncounted  
23 conditional provisional ballots as required by the Court's January 22, 2008 Order and  
24 Gonzalez Plaintiffs' subsequent subpoenas, Gonzalez Plaintiffs are unable to describe at  
25 this time how the discovery provided by Defendants relates to the facts contended by  
26  
27  
28

1 Gonzalez Plaintiffs with respect to the disparate impact of the voter identification  
2 requirements of Proposition 200.  
3

4 **3. Identify each and every fact upon which you base your contention that**  
5 **Arizona, or any political subdivision thereof, has a history of official**  
6 **discrimination that touched the right of any Latinos to register, to vote, or to**  
7 **otherwise participate in democratic process.**

8 Answer:

9 Without waiving any general objections and objections previously stated in  
10 response to this interrogatory, Plaintiff further objects to the interrogatory to the extent  
11 that it seeks an impermissible narrative account of Plaintiff's case and claims.

12 Plaintiff Valle Del Sol supplements its answer to the interrogatory as follows:

13 Arizona, because of past voting rights violations, is one of several states that  
14 must submit any and all modifications, changes, or revisions to its voting practices to  
15 the United States Department of Justice for "preclearance" before the changes can be  
16 instituted. For example, in 2006 the Justice Department settled a voting rights lawsuit  
17 with Cochise County, which had failed to meet its legal responsibilities under Section  
18 203 of the Voting Rights Act to provide materials and assistance to Spanish-speaking  
19 voters at the polls and failed to provide all of the information required by the Help  
20 America Vote Act.  
21  
22

23  
24 **4. Identify each and every fact upon which you base your contention that**  
25 **voting in the elections of the State, or any political subdivision thereof, is**  
26 **racially polarized with regard to Latinos.**

27 Answer:  
28

1 **10. Identify each and every fact upon which you base your contention that**  
2 **elected officials of Arizona, or of any political subdivision thereof, lack**  
3 **responsiveness to the particularized needs of Latinos.**

4 Answer:

5 Without waiving any general objections and objections previously stated in  
6 response to this interrogatory, Plaintiff further objects to the interrogatory to the extent  
7 that it seeks an impermissible narrative account of Plaintiff's case and claims.

8 Plaintiff Valle Del Sol supplements its answer to the interrogatory as follows:

9  
10 Arizona, because of past voting rights violations, is one of several states that  
11 must submit any and all modifications, changes, or revisions to its voting practices to  
12 the United States Department of Justice for "preclearance" before the changes can be  
13 instituted. For example, in 2006 the Justice Department settled a voting rights lawsuit  
14 with Cochise County, which had failed to meet its legal responsibilities under Section  
15 203 of the Voting Rights Act to provide materials and assistance to Spanish-speaking  
16 voters at the polls and failed to provide all of the information required by the Help  
17 America Vote Act.  
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21 **11. Identify each and every fact upon which you based your allegation in**  
22 **paragraph 75 of the First Amended Complaint that "Latinos, among other**  
23 **ethnic groups, are less likely to possess the forms of identification required**  
24 **under Proposition 200 to register to vote and cast a ballot."**

25 Answer:

26 Without waiving any general objections and objections previously stated  
27 in response to this interrogatory, Plaintiff further objects to the interrogatory to the  
28 extent that it seeks an impermissible narrative account of Plaintiff's case and claims.

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Plaintiff Valle Del Sol supplements its answer to the interrogatory as follows:

As noted in the supplemental response to interrogatory 1, Latinos are less likely to possess documents that satisfy the proof of citizenship requirement of Proposition 200 because, among other things, they have a lower socio-economic status when compared to non-Latinos or Anglos and comprise a greater proportion of naturalized citizens when compared to non-Latinos or Anglos in Arizona.


As noted in the supplemental response to interrogatory 2, Latinos are less likely to be able to satisfy the voter identification requirement of Proposition 200 because, among other things, they have a lower socio-economic status when compared to non-Latinos or Anglos.

Mr. Jesus Gonzalez does not possess a driver's license dated after October 1, 1996.

Dated: February 8, 2008

Respectfully submitted,

MEXICAN AMERICAN LEGAL DEFENSE  
AND EDUCATIONAL FUND

By:   
Diego M. Bernal

Attorneys for Plaintiffs  
Gonzalez, et al.

CERTIFICATE OF SERVICE

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**VERIFICATION OF ANSWERS TO INTERROGATORIES**

I, Luz M. Sarmine, declare, under penalty of perjury under the laws of the United States that the facts stated in the foregoing Interrogatories and Answers are true to the best of my knowledge or belief.

Luz Sarmine

Dated: 2/8/08