

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
MCALLEN DIVISION

FEDERICO FLORES, JR., et al.,

*Plaintiffs,*

v.

RUTH R. HUGHS, IN HER OFFICIAL  
CAPACITY AS TEXAS SECRETARY  
OF STATE, et al.,

*Defendants.*

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Civil Case No. 7:18-cv-00113

**STARR COUNTY DEMOCRATIC PARTY’S MOTION TO INTERVENE**

Starr County Democratic Party (SCDP) moves to intervene in this case, pursuant to Federal Rule of Civil Procedure 24(b), to seek relief in advance of the July 2020 primary runoff elections, based on the same claims already being litigated by the current Plaintiffs. SCDP is especially interested in securing relief in time for the July runoffs, and intervention in this lawsuit to seek a timely ruling is the most efficient means of seeking such relief. If intervention is denied, SCDP will have to seek the same relief by filing a new lawsuit in this judicial division.

**INTRODUCTION**

A prospective party may seek to intervene *as of right* in certain specific circumstances, or may seek *permissive* intervention. Federal Rule of Civil Procedure 24(b) governs permissive intervention, and provides that “[o]n timely motion, the court may permit anyone to intervene who: ... (B) has a claim or defense that shares with the main action a common question of law or fact.” Fed. R. Civ. P. 24(b)(1)(B). Permissive intervention is a matter “wholly discretionary with the [district] court ... even though there is a common question of law or fact, or the requirements

of Rule 24(b) are otherwise satisfied.” *New Orleans Pub. Serv., Inc. v. United Gas Pipe Line Co.*, 732 F.2d 452, 470-71 (5th Cir. 1984). However, “[R]ule 24 is to be construed liberally, and doubts resolved in favor of the proposed intervenor.” *In re Lease Oil Antitrust Litigation*, 570 F.3d 244, 248 (5th Cir. 2009) (internal citations and punctuation omitted). Intervention is intended to prevent multiple lawsuits when common questions of law or fact are involved. *Deus v. Allstate Ins.*, 15 F.3d 506, 525 (5th Cir. 1994).

### FACTS

Primary runoff elections will be held July 14, 2020.<sup>1</sup> There are two statewide races on the ballot for Democrats. Thus, Starr County Democrats will choose between Mary “MJ” Hegar and Royce West for United States Senator, and between Roberto R. “Beto” Alonzo and Chrysta Castaneda for Railroad Commissioner as per the Texas Secretary of State website. Thursday, July 2, 2020, is the last day for the early voting clerk to receive an application for a ballot to be voted by mail. Tex. Elec. Code § 84.007(c); Texas Sec’y of State, Election Advisory No. 2020-13, Updated July 14, 2020 Primary Runoff Calendar.<sup>2</sup>

Thus, for any voters who have not already submitted an application to vote by mail for elections in the year 2020, they must make the decision to complete and submit such application with sufficient time to send it to the early voting clerk so that it is received on or before July 2, 2020.

Hilda Gonzalez Garza was appointed chair of the Starr County Democratic Party on January 22, 2020. **Exhibit 2** (Garza decl.).

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<sup>1</sup> Originally scheduled for May 26, 2020, the runoff primary elections were moved to July 14, 2020 by proclamation of Governor Abbott due to the coronavirus pandemic. *Proclamation of the Governor of the State of Texas* (Mar. 20, 2020) (**Exhibit 1**).

<sup>2</sup> <https://www.sos.state.tx.us/elections/laws/advisory-2020-13.shtml>

Approximately 14,462 persons cast a ballot in the March 3, 2020 Democratic Primary elections in Starr County. 579 of these ballots were cast by mail. Of those mail ballots, approximately 87 were rejected by the Starr County Early Voting Ballot Board, and most of those rejected were rejected on the basis of a perceived signature discrepancy. **Exhibit 2 ¶ 3; Exhibit 2-A** (redacted list of rejected mail ballots). The record in this case already reflects that 147 mail ballots were rejected by the Starr County EVBB in the previous primary elections (March 2018), 146 of those for claimed signature discrepancies. Plaintiffs' Exhibit 6A (ECF No. 68, filed Jul. 29, 2019). SCDP incorporates this Exhibit 6A herein.

With the recent COVID-19 pandemic, more people will likely continue to “socially distance” themselves and will chose to vote by mail, thus an increase in BBM is expected in Texas for the upcoming run off and general elections.

## ARGUMENT

### I. Common Questions of Law or Fact

“The decision to permit intervention under Rule 24(b)(2) requires a threshold determination that the applicant’s claim or defense and the main action have a question of law or fact in common.” *Newby v. Enron Corp.*, 443 F.3d 416, 421 (5th Cir. 2006) (internal quotations omitted).

This requirement is easily met here. Starr County Democratic Party seeks to intervene to join in the constitutional claims that the current voter-Plaintiffs have asserted: *i.e.*, that Texas Election Code §§ 87.041(b)(2) and 87.041(d) violate procedural due process to the extent explained by Plaintiffs. In fact, if permitted to intervene, SCDP seeks to simply join in the arguments already asserted by the current Plaintiffs, in their *Second Amended Motion for Summary Judgment* (Doc. 94, incorporating evidence and arguments submitted in Docs. 67, 76, and 77), and

seek the exact same remedy already proposed by the current Plaintiffs, (Doc. 94 and attachments thereto). Thus, there is not merely *a* common question of law or fact, but—as to the substantive arguments and proposed remedy—SCDP’s proposed intervention overlaps entirely with the voter Plaintiffs’ case.

Because the SCDP’s proposed claims overlap with the litigation, the threshold requirement is met. SCDP seeks to intervene, however, to assert and protect its interest, on behalf of itself and of Democratic voters in Starr County, in securing relief that can be implemented in the July 2020 runoff elections. SCDP has a special interest in ensuring constitutional procedures are in place to protect the votes of all Democratic voters in upcoming elections. Exhibit 2 ¶ 4; *Crawford v. Marion County Election Bd.*, 472 F.3d 949, 951 (7th Cir. 2007) (“The Democratic Party also has standing to assert the rights of those of its members who will be prevented from voting by the new law.”), *aff’d*, 553 U.S. 181, 189 n.7 (plurality) (“We also agree with the unanimous view of [the circuit court] judges that the Democrats have standing to challenge the validity of SEA 483[.]”); *see also id.* at 209 n.2 (Souter, J., dissenting on the merits, but agreeing that the Democratic Party petitioners had standing and thus that it was unnecessary to examine whether individuals and other groups have standing); *Texas Democratic Party v. Benkiser*, 459 F.3d 582, 585-86 (5th Cir. 2006); *Sandusky County Democratic Party v. Blackwell*, 387 F.3d 565, 573-74 (6th Cir. 2004); *Florida Democratic Party v. Hood*, 342 F. Supp. 2d 1073, 1079 (N.D. Fla. 2004) (finding Party “has standing to assert, at least, the rights of its members who will vote in the November 2004 election”).<sup>3</sup>

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<sup>3</sup> SCDP thus has standing itself. However, SCDP is not actually required to independently establish standing since the intervention would be into a continuing Article III case or controversy in which the present Plaintiffs already have standing for the requested relief. *Newby v. Enron Corp.*, 443 F.3d 416, 422 (5th Cir. 2006) (citing *Ruiz v. Estelle*, 161 F.3d 814, 830 (5th Cir. 1998)).

## **II. Intervention Is Timely.**

The Fifth Circuit examines timeliness according to four factors:

(1) the length of time during which the intervenor actually knew or reasonably should have known of his interest in the case; (2) the extent of prejudice to the existing parties to the litigation; (3) the extent of prejudice to the would-be intervenor; and (4) unusual circumstances.

*Adam Joseph Res. v. CNA Metals Ltd.*, 919 F.3d 856, 865 (5th Cir. 2019). “The requirement of timeliness is not a tool of retribution to punish the tardy would-be intervenor, but rather a guard against prejudicing the original parties by failure to apply sooner[.] *Id.* “Federal courts should allow intervention ‘where no one would be hurt and greater justice could be attained.’” *Id.* (quoting *Sierra Club v. Espy*, 18 F.3d 1202, 1205 (5th Cir. 1994)).

### **a. Length of time since learning of interest in the action.**

Hilda Garza was appointed Chair of the SCDP on January 22, 2020. While she was aware of this litigation at the time she was appointed, she also knew that the Court had already indicated in October 2019 that the challenged laws were unlikely to be upheld and had urged the Secretary of State’s office to work with the Plaintiffs on a resolution. Given that the Secretary’s office continues to resist those efforts, SCDP seeks intervention now because it is important to the Party to ensure that another election is not conducted in which Democratic voters in the County will be unconstitutionally disenfranchised due to the lack of a signature cure procedure that satisfies due process requirements. Exhibit 2 ¶ 6. Garza is aware that the Court, in the March 25 hearing, indicated that it would not issue a judgment before the July runoff elections. The SCDP must, then, protect its interests by intervening into this case or, if denied intervention, by filing a wholly new lawsuit in the McAllen Division, and seeking the exact same relief based on the exact same arguments already raised in this suit, which are ripe for resolution. Mail ballots are rejected every

election, pandemic or no pandemic, for perceived signature discrepancies with no constitutional cure procedure available for those disenfranchised voters.

Moreover, given the present pandemic, implementation of the remedy before the next elections are conducted has now become even more important because SCDP anticipates more Democratic voters in the County will seek to vote by mail in order to avoid potential exposure to the virus at the polls. Exhibit 2 ¶ 8. This is true even apart from the ultimate resolution of whether eligibility for ballot by mail is expanded, because SCDP anticipates that a number of County voters already eligible to vote by mail because they are over 65 years of age, but who have always or periodically voted in person, will choose to vote by mail during the pandemic.

**b. Prejudice to existing parties if intervention is allowed.**

The relevant prejudice inquiry is whether the existing parties would be prejudiced by the intervenor's *delay* in seeking intervention—if any—“not the inconvenience to the existing parties of allowing the intervenor to participate.” *Adam Joseph Resources*, 919 F.3d at 865; *In re Oil Antitrust Litigation*, 570 F.3d at 248 (“Any potential prejudice caused by the intervention itself is irrelevant, because it would have occurred regardless of whether the intervention was timely .... The only proper concern is how much more prejudice would come from Texas’s intervening in January 2008 compared to its intervening in March 2006.”).

Neither the Secretary nor the EVBB Defendants can claim prejudice by the proposed participation of the SCDP, given that the intervenor does not seek to add any argument or otherwise expand the scope of the litigation. SCDP seeks only to join in the arguments already made, and to join in requesting the exact same remedy proposed by the Plaintiffs (except, to the extent necessary, to seek a preliminary injunction if the Court will not enter a permanent injunction before the July runoffs). The issues have been briefed. Because SCDP proposes to intervene simply to

assert the same substantive claims as the Plaintiffs, no discovery should be necessary. The only new facts adduced by intervenor are the basic facts establishing Ms. Garza's status as Chair and her statements as to the importance of the Party's interest in securing relief. To the extent the Defendants (predictably) protest that they will require a period of discovery to delve deeply into these unobjectionable facts, it would not pose an obstacle to the timely resolution of this case. Ms. Garza will make herself available at a mutually agreeable time for a deposition if requested by the parties. Neither will Plaintiffs be prejudiced, because SCDP seeks to join in their requests, and Plaintiffs are unopposed.

For these reasons, this factor weighs exclusively in favor of intervention.

**c. Prejudice to SCDP if its motion to intervene is denied.**

To determine potential prejudice to SCDP if intervention is denied, the court examines opportunities SCDP would have to seek the same relief if it cannot intervene. *In re Lease Oil Antitrust Litigation*, 570 F.3d at 249.

SCDP would be free to file its own lawsuit to seek the same relief the Plaintiffs seek in the instant case. SCDP would incur more expense to file its own suit, however, because doing so would, at a minimum, require filing a motion to consolidate with this suit, or responding to a consolidation motion that might be filed by Plaintiffs or Defendants here. Litigation of the consolidation issue itself would require time and resources, and would potentially incur at least some additional measure of delay before reaching disposition of the merits or a preliminary motion for relief. If consolidation were granted, the court and parties would then be in the same position as if this intervention had been granted. If consolidation were denied, SCDP would then incur the expense of briefing the substance of the dispute and moving for a TRO or preliminary injunction. On the other hand, allowing intervention would allow SCDP to simply add itself to the substantive

arguments, including the expert testimony of Dr. Mohammed and the other evidence, already adduced in this case, saving SCDP substantial effort, delay, and resources. Just as the Fifth Circuit held in allowing Texas’s intervention in *In re Lease Oil Antitrust Litigation*, “[i]ntervening in the existing federal lawsuit is the most efficient, and most certain, way for [SCDP] to pursue its claim.” 570 F.3d at 249-50 (granting Texas’ motion to intervene post-judgment, which motion was filed two years after Texas had notice of its interest in the case).

**d. Unusual circumstances**

Sometimes, “unusual circumstances” can weigh in favor of or against the intervention. *See Adam Joseph Resources*, 919 F.3d at 866; *In re Lease Oil Antitrust Litigation*, 570 F.3d at 250. There are several circumstances here that weigh in favor of the intervention.

The first is the public interest in ensuring a sufficient cure process regarding mail ballots slated for rejection for signature issues in upcoming elections, given the anticipated uptick in the number of Starr County and other Texas voters who will choose to vote by mail during the coronavirus pandemic. The Party has a pressing interest in securing relief before further votes are thrown out without a constitutionally sufficient cure process. This is true in any election; it is more acute at this particular moment as more voters may wish to avail themselves of mail-in balloting.

The second unusual circumstance is the fact that, while it proceeds in analyzing the proposed remedy, the Court has already strongly indicated that Texas’s current process is invalid, just as has been held in *all the other states* where this issue has been litigated. Given the likely increased importance of mail balloting as an option for voters in the next several months, and the Court’s recognition that the current process violates voters’ rights, there is no reason to delay resolution of these issues in this case and force SCDP to file a new lawsuit, starting the process over again.



**PRAYER**

For the above reasons, Plaintiffs respectfully request that the Court permit the SCDP to intervene, and file the accompanying Complaint in Intervention and Motion for Preliminary and Permanent Injunction (attached hereto as Exhibits 3 and 4) in the case.

Respectfully submitted,

/s/Martie Garcia Vela  
Martie Garcia Vela  
*Attorney for Intervenor*  
*Starr County Democratic Party*  
SBN: 24058898  
*Law Office of Martie Garcia Vela, PC*  
*509 N. San Antonio*  
*Rio Grande City, Texas 78582*  
*956-488-8170 (phone)*  
*956-488-8129 (fax)*  
*martie.garcia@gmail.com*

*Of counsel:*

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jerad@najvarlaw.com  
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Tex. Bar No. 24104681  
S.D. Tex. No. 3348472  
281.410.2003 [Phone]  
austin@najvarlaw.com  
2180 North Loop West, Ste. 255  
Houston, TX 77018

**Certificate of Conference**

Counsel for SCDP has conferred by email with counsel for the Secretary of State and the Early Voting Ballot Board Defendants regarding this intervention, who indicated that they are opposed.

/s/ Jerad Najvar  
Jerad Najvar

**Certificate of Service**

The undersigned counsel hereby certifies that on May 1, 2020, the foregoing document, along with any exhibits and proposed order, was served on the following counsel of record in this matter by means of the court's CM/ECF system:

Mr. Jerad Wayne Najvar  
2180 North Loop West, Ste. 255  
Houston, TX 77018  
*Counsel for Plaintiffs*

Mr. Michael R. Abrams  
PO Box 12548, Capitol Station  
Austin, TX 78711  
*Counsel for Defendant Ruth R. Hughes*

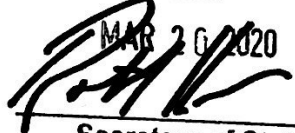
Mr. Martin Golando  
405 N. Saint Mary's, Suite 700  
San Antonio, TX 78205  
*Counsel for ballot board Defendants*

/s/Martie Garcia Vela  
Martie Garcia Vela

March 20, 2020

The Honorable Ruth R. Hughs  
Secretary of State  
State Capitol Room 1E.8  
Austin, Texas 78701

FILED IN THE OFFICE OF THE  
SECRETARY OF STATE  
6:35pm 'CLOCK

MAR 20 2020  
  
Secretary of State

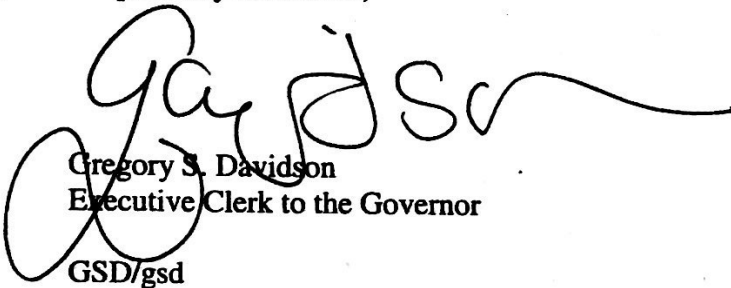
Dear Secretary Hughs:

Pursuant to his powers as Governor of the State of Texas, Greg Abbott has issued the following:

A proclamation that: suspends Section 41.007(b) of the Texas Election Code to the extent necessary to postpone the runoff primary election date until Tuesday, July 14, 2020; suspends Section 41.007(d) of the Texas Election Code to the extent necessary to allow for the runoff primary election to be held on the same date as the special election for Texas State Senate District No. 14, which has already been ordered for Tuesday, July 14, 2020; and suspends Section 41.008 of the Texas Election Code to the extent it would preclude holding the runoff primary election on July 14, 2020.

The original of this proclamation is attached to this letter of transmittal.

Respectfully submitted,

  
Gregory S. Davidson  
Executive Clerk to the Governor  
GSD/gsd

Attachment

POST OFFICE BOX 12428 AUSTIN, TEXAS 78711 512-463-2000 (VOICE) DIAL 7-1-1 FOR RELAY SERVICES

EXHIBIT 1

# Governor of the State of Texas

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**TO ALL TO WHOM THESE PRESENTS SHALL COME:**

WHEREAS, Texas held its general primary election on March 3, 2020, and in multiple races, no candidate received a majority of the total number of votes cast; and

WHEREAS, Section 2.021 of the Texas Election Code requires that a runoff election be held if no candidate receives the votes necessary to be elected; and

WHEREAS, Section 41.007(b) of the Texas Election Code requires that the runoff primary election date is the fourth Tuesday in May following the general primary election, and for this year, that date is May 26, 2020; and

WHEREAS, Section 41.007(d) of the Texas Election Code provides that no other election may be held on the date of a primary election; and

WHEREAS, Section 41.008 of the Texas Election Code provides that an election held on a date not permitted is void; and

WHEREAS, on March 13, 2020, the Governor of Texas certified that the novel coronavirus (COVID-19) poses an imminent threat of disaster and, under the authority vested in the Governor by Section 418.014 of the Texas Government Code, declared a state of disaster for all counties in Texas; and

WHEREAS, the Commissioner of the Texas Department of State Health Services has now determined that, as of March 19, 2020, COVID-19 represents a public health disaster within the meaning of Chapter 81 of the Texas Health and Safety Code; and

WHEREAS, also on March 19, 2020, the Governor issued an executive order in accordance with the President's Coronavirus Guidelines for America, as promulgated by President Donald J. Trump and the Centers for Disease Control and Prevention, and mandated certain obligations for Texans that are aimed at slowing the spread of COVID-19; and

WHEREAS, Texas law provides that eligible voters have a right to cast a vote in person on the day of the election; and

WHEREAS, holding the runoff primary election on May 26, 2020, would cause the congregation of large gatherings of people in confined spaces and force numerous election workers to come into close proximity with others, thereby threatening the health and safety of many Texans and literally exposing them to risk of death due to COVID-19; and

WHEREAS, holding the runoff primary election on May 26, 2020, would therefore prevent, hinder, or delay necessary action in containing the COVID-19 disaster; and



WHEREAS, pursuant to Section 418.016 of the Texas Government Code, the Governor has the express authority to suspend the provisions of any regulatory statute prescribing the procedures for conduct of state business or the orders or rules of a state agency if strict compliance with the provisions, orders, or rules would in any way prevent, hinder, or delay necessary action in coping with a disaster:

NOW, THEREFORE, I, GREG ABBOTT, Governor of Texas, under the authority vested in me by the Constitution and laws of the State of Texas, do hereby suspend Section 41.007(b) of the Texas Election Code to the extent necessary to postpone the runoff primary election date until Tuesday, July 14, 2020. I further hereby suspend Section 41.007(d) of the Texas Election Code to the extent necessary to allow for the runoff primary election to be held on the same date as the special election for Texas State Senate District No. 14, which has already been ordered for Tuesday, July 14, 2020. Finally, I hereby suspend Section 41.008 of the Texas Election Code to the extent it would preclude holding the runoff primary election on July 14, 2020.

Early voting by personal appearance shall begin on Monday, July 6, 2020, in accordance with Section 85.001(b) of the Texas Election Code.



IN TESTIMONY WHEREOF, I have hereto signed my name and have officially caused the Seal of State to be affixed at my office in the City of Austin, Texas, this the 20th day of March, 2020.

A handwritten signature in cursive script, reading "Greg Abbott".

GREG ABBOTT  
Governor of Texas

ATTESTED BY:

A handwritten signature in cursive script, reading "Ruth R. Hughes".

RUTH R. HUGHES  
Secretary of State

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
MCALLEN DIVISION

FEDERICO FLORES, JR., et al.,

*Plaintiffs,*

v.

RUTH R. HUGHS, IN HER OFFICIAL  
CAPACITY AS TEXAS SECRETARY  
OF STATE, et al.,

*Defendants.*

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Civil Case No. 7:18-cv-00113

**DECLARATION OF HILDA GONZALEZ GARZA,  
CHAIR OF THE STARR COUNTY DEMOCRATIC PARTY**

1. My name is Hilda Gonzalez Garza, and I maintain a principal place of business at 205 East Fifth Street, Rio Grande City, Texas 78582. I am a registered voter of Starr County, Texas. I was appointed the Chair of the Starr County Democratic Party on January 22, 2020, by Gilberto Hinojosa, Chair of the Texas Democratic Party. (Attached hereto as Exhibit A is a copy of the appointment letter.)

2. Approximately 14,462 persons cast a ballot in the March 3, 2020 Democratic Primary elections in Starr County. Approximately 579 of these ballots were cast by mail. Of those mail ballots, around 87 were rejected by the Starr County Early Voting Ballot Board.

3. Marlo Canales, the presiding judge of the Starr County early voting ballot board during the March 2020 primaries, provided me with a list of the names of voters whose mail ballots were rejected by the ballot board for perceived signature discrepancies. A true and correct copy of that list is attached hereto as Exhibit 2-A. (The list has been redacted to show only the person's first name and voter ID number.) The list reflects that 87 mail ballots were rejected in March 2020 for perceived signature discrepancy.

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*Flores v. Secretary of State: Plfs' Second Amended MSJ*

**EXHIBIT 2**

4. As the Chair of the Democratic Party for Starr County, it is important that all registered voters who cast a ballot in our primary elections have that ballot counted in accordance with legal requirements. This means that those who cast a ballot by mail which is identified for rejection due to a perceived signature discrepancy have the opportunity to affirm that they did, indeed, submit the ballot, so that it can be counted in the election at issue. This is important for several reasons.

5. First, it is important to the Democratic Party that all our voters' ballots are counted so that the election accounts for every person's vote who desired to vote in the election. This is particularly important in a small county like Starr, where it is not uncommon to have extremely close elections in the smaller local races, sometimes decided by a handful of votes.

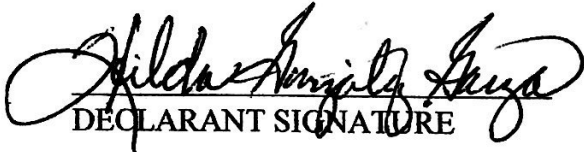
6. Second, it is important because voters who have their mail ballots rejected, and who receive notice of that fact after the election and with no opportunity to ensure their ballot counts, can react negatively to being disenfranchised, and embittered by the process.

7. In primary elections, this reflects negatively on the Party as well, because the Party shoulders some statutory responsibility for conducting primaries, but at the same time is powerless to change state law outside of litigation. While the Party does not shoulder the same responsibility for certain actions in conducting general elections as with the primary, it is nonetheless, of course, important that all legitimate ballots are counted.

8. In light of the current coronavirus pandemic, based on my conversations with Starr County voters and election officials, I anticipate that more than the normal proportion of Starr County Democratic voters will seek to vote by mail in the July runoffs and in November 2020. Many voters have expressed to me that they plan on voting by mail rather than in person to avoid the chance of infection at the polling place. I am referring here to voters who are over

voters who are over the age of 65, and thus who are statutorily eligible to vote by mail already, but who nonetheless typically have voted in person.

Pursuant to 28 U.S.C. § 1746, I verify under penalty of perjury that the statements contained in this verification are true and correct. Executed in Starr County, State of Texas, on April 27, 2020.

  
DECLARANT SIGNATURE



# TEXAS DEMOCRATS

Date: 1/22/2020

To: Texas Secretary of State

From: Gilberto Hinojosa, Chair, Texas Democratic Party

Re: Appointments of Democratic County Chair

Cc: Dan Glotzer and Keith Ingram

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Please update your list to include the following person as the Democratic County Chair:

## **Starr County Democratic Chair**

Hilda Gonzalez Garza  
205 East Fifth Street  
Rio Grande City, Texas 78582

Phone: (956) 844-5250

Email: [hilda\\_garza.lawoffice@aol.com](mailto:hilda_garza.lawoffice@aol.com)

Muchas Gracias. Adelante!



Gilberto Hinojosa  
Chair of the Texas Democratic Party

EXHIBIT A

Gonzalez	1005977301
Zamora	1006027865
Rosalez	1005965979
CavaZos	2162059877
Sepulveda	1188655942
Salinas	1006007377
Muñoz	1005985087
Gutierrez	1010820070
Ramirez	1006030508
Lopez	1000511937
Rmz Jr	1006066385
Mendoza	1006101380
Perez	1005995667
Perez	200056114
Mendez	1005963049
Garza	1006066675
Juarez	2003376388
Moreno	1206050673
Rodriguez	
Hinojosa	1014112431
Escobar	1006966990
Ezparza	1202851700
Garza Lopez	1174957797
Garza Salazar	
Garcia	1015394702
Lopez	1013045933
Rosalez	1006012213
Elva Casanova	1206042206
Alvarado	1206105327
Muñiz	1006122676

EXHIBIT 2A



[REDACTED]	R. Olivarez	102.3599161
[REDACTED]	Morin	1006042210
[REDACTED]	Grabert	1006057757
[REDACTED]	Gomez	1007000847
[REDACTED]	Garza	1009445343
[REDACTED]	Ramos	1006095277
[REDACTED]	Luz Garcia	1012037513
[REDACTED]	Garcia	1006131624
[REDACTED]	Prado Jr	
[REDACTED]	Garcia	1009047370
[REDACTED]	Saenz	
[REDACTED]	Rodriguez	
[REDACTED]	Saenz	1006089143
[REDACTED]	Castaneda	1005992599
[REDACTED]	Salinas Hinojosa	1011592875

[REDACTED] Ramirez 100608054  
[REDACTED] Perysquira 2119505175  
[REDACTED] Ramirez  
[REDACTED] Gonzalez 1006029418  
[REDACTED] Renteria 1006128858  
[REDACTED] Lopez 2148513819  
[REDACTED] Solis 1009428309  
[REDACTED] Munoz 1184051817  
[REDACTED] Rael Vela 1006024389  
[REDACTED] Perez 1143457510  
[REDACTED] Flores 1005981329  
[REDACTED] Trejo 1210568851  
[REDACTED] Aleman 1009240853  
[REDACTED] Saenz 1005206794  
[REDACTED] Venecia H.  
[REDACTED] Pruneda 1178261294  
[REDACTED] Guerra 1206115731  
[REDACTED] Garcia 1006088543  
[REDACTED] Alanis 2145705301  
[REDACTED] Garcia 2129157452  
[REDACTED] Alanis H. 2120092100  
[REDACTED] Alanis 2162982543  
[REDACTED] Ramos 1167594677  
[REDACTED] Perez 1196593865  
[REDACTED] Garcia 1006138125  
[REDACTED] Garcia 1209432893  
[REDACTED] Ramirez 1006085123  
[REDACTED] De la Cruz 1006081129  
[REDACTED] Montoya Sanchez 1006003161  
[REDACTED] Vela 1011960695



[REDACTED] Jones 1198722642  
[REDACTED] Canales 1006067323