

APPENDIX

APPENDIX

Exhibit A, Declaration of Jacquelyn F. Callanen, *Semien v. Hughes*,
WDTX Civ. Act. No. 1:20-cv-000789-LY (Doc. 22-2)
(Sept. 11, 2020)..... App. 1

Exhibit B, Declaration of Larry Johnson App. 8

Exhibit C, Declaration of Wendy Walker..... App. 13

Exhibit D, Declaration of Amelia Pellicciotti..... App. 17

Exhibit E, Declaration of Norma Crosby..... App. 22

Exhibit F, Declaration of Chase Bearden App. 27

Exhibit A

Exhibit B

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

KENNETH SEMIEN, JONATHAN
FRANKS, SEAN PEVSNER;

NATIONAL FEDERALATION
OF THE BLIND OF TEXAS; and

THE COALITION OF TEXANS
WITH DISABILITIES,

Plaintiffs,

vs.

RUTH HUGHS, Texas Secretary
of State, in her official capacity,

Defendant.

§
§
§
§
§
§
§
§
§
§
§
§
§
§
§
§

Civil Action No. 1:20-cv-00789-LY

DECLARATION OF JACQUELYN F. CALLANEN

I, Jacquelyn F. Callanen, declare as follows:

1. I am over the age of 18 and am competent to make this declaration.
2. I am the Elections Administrator for Bexar County, Texas. I am responsible for voter registration activities and election operations throughout Bexar County. This includes 712 voting precincts, 53 political subdivisions, 20 Independent School Districts, 29 Cities, 3 Military Installations (including Lackland AFB, Fort Sam Houston, and Randolph Air Force Base), and over 1,158,340 registered voters.
3. My office is responsible for facilitating overseas voting for military members, their families, and U.S. citizens living overseas pursuant to the Uniformed and Overseas Citizens Absentee Voting Act and the Military and Overseas Voter Empowerment Act.
4. Under Texas' current system, military voters may choose to receive a ballot by mail electronically, rather than in hard copy.
5. Bexar County currently utilizes the MOVE Edge system for providing ballots to military members overseas. After applying for a ballot by mail, an email is sent to the voter that includes a secure link. The voter then accesses the link and downloads the voter's ballot and

voting instructions. After marking the ballot, the voter then prints the ballot and returns it to the Bexar county elections office.

6. This system for military voting allows members of the military stationed overseas to receive their ballots in an accessible electronic format. If extended to voters with print disabilities, this system would allow such voters to use screen reader software to read their ballots and doing so would allow voters to cast an absentee ballot in a more private, independent manner.
7. If allowed by the Texas Secretary of State to extend this email system of distributing ballots, Bexar County could provide this option of voting to voters with disabilities without much additional expense or time.
8. The Secretary of State has not allowed Bexar County to extend its military voting system to voters with disabilities as an accommodation to allow them to vote more privately and independently.
9. Bexar County is expected to follow the guidance provided by the Secretary of State and Election Administrators understand there will be action by the Secretary of State if we do not follow her guidance.
10. I am aware of the August 27, 2020 demand letter the Secretary of State sent to the Harris County Clerk threatening legal action regarding Harris County's mailing of an Application to Vote By Mail to all registered Harris County voters, attached as Exhibit A. I am taking into account this type of potential action by the Secretary of State when making the decision not to offer ballot by mail electronically to voters who are blind or have print disabilities.
11. If given permission, I believe Bexar County could make its overseas military voting system available for voters with disabilities for the November 3, 2020 general election, if a decision is rendered by September 26, 2020.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 11, 2020


Jacquelyn F. Callanen

Exhibit A

The State of Texas



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

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

Ruth R. Hughs
Secretary of State

August 27, 2020

Chris Hollins
Harris County Clerk
201 Caroline St., 3rd Floor
Houston, Texas 77002

Dear Mr. Hollins:

It has come to our office's attention that Harris County intends to send an application to vote by mail to every registered voter in the county. Such action would be contrary to our office's guidance on this issue and an abuse of voters' rights under Texas Election Code Section 31.005.

As you know, the Texas Election Code requires that voters have a qualifying reason to vote by mail. They must be 65 years or older, disabled, out of the county while voting is occurring, or confined in jail but otherwise eligible to vote. It is not possible that every voter in Harris County will satisfy one or more of these requirements.

By sending applications to all voters, including many who do not qualify for voting by mail, your office may cause voters to provide false information on the form. Your action thus raises serious concerns under Texas Election Code Section 84.0041(a)(1), (2).

At a minimum, sending an application to every registered voter will confuse voters about their ability to vote by mail. Earlier this year and continuing, there have been a number of lawsuits challenging the fact that Texas law requires a reason to vote by mail. Thus far the challenged law remains the same in spite of these lawsuits. An official application from your office will lead many voters to believe they are allowed to vote by mail, when they do not qualify.

Finally, by sending an application to every registered voter, you could impede the ability of persons who need to vote by mail to do so. Clogging up the vote by mail infrastructure with potentially millions of applications from persons who do not qualify to vote by mail will make it more difficult for eligible mail voters to receive their balloting materials in a timely manner and will hamper efforts to qualify and count these ballots when received by your office.

For all of these reasons, you must immediately halt any plan to send an application for ballot by mail to all registered voters and announce its retraction. If you have not done so by noon on Monday, August 31, 2020, I will request that the Texas Attorney General take appropriate steps under Texas Election Code 31.005.

Sincerely,

A handwritten signature in blue ink, appearing to read "Keith Ingram".

Keith Ingram
Director of Elections

Exhibit B

6. I use the Jobs Access With Speech (JAWS) screen reader.
7. I am a registered Texas voter. I am eligible for ballot-by-mail voting and would like to vote in future elections, including the November 2022 election, by mail.
8. Without electronic access to an accessible absentee ballot, I would have to rely on family that does not live with me to fill out my ballot for me. I would not feel comfortable having someone who was not a family member fill out my ballot. I also would not feel comfortable having someone with conflicting political views fill out my ballot.
9. Even having a family member fill out my ballot for me, I worry that the person helping me would not mark my ballot correctly.
10. I am also concerned that whoever assists me would not understand the ballot instructions or put my identifying number — voter ID, driver's license, or social security — in the right place. If those numbers are wrong or don't match up with what the election office had on file for me my ballot would not be counted.
11. It is very important to me to vote privately and independently because it is a personal and private decision and I should have the same right to a secret ballot as any other voter.
12. The privacy concerns raised by having someone assist me with my ballot are even more significant now that Texas requires you to write one of these identifying numbers on your mail-in ballot. This is not information I feel comfortable sharing with someone else in order to fill out my ballot.
13. Before the 2020 election I reached out to the Bexar County elections administrator Jacqueline (Jacque) Callanen about receiving an accessible, electronic ballot.

14. I was concerned about going to the polls in person because I have COPD and am therefore at a high risk for infection with COVID-19, including from asymptomatic people.

15. When I first called Ms. Callanen about making accessible, electronic ballots available for blind and print-disabled voters she told me she didn't see why not, but that she would have to get the Texas Secretary of State's office to approve it.

16. Ms. Callanen also emailed me a copy of the accessible, electronic ballot Bexar County sends to military members overseas and I found it to be accessible.

17. I contacted Ms. Callanen a few times after that, but each time she told me she had not received an answer from the Secretary of State. I never got copied on or saw any communications between Ms. Callanen and the Secretary of State.

18. Because I did not receive an accessible, mail-in ballot and I was concerned about putting my health at risk when COVID-19 was rampant, I had to have my granddaughter drive to my home to assist me with filling out my ballot in the 2020 primary and general elections.

19. Even though I was still very concerned about voting in person in the March 2022 primary election because of COVID-19 and my underlying medical condition, I did so because I did not receive an accessible mail-in ballot and did not want impose on family to help me vote or worry about my ballot being completed correctly again.

20. When I went to vote in person in the March 2022 primary, I had a negative experience with the election judge at my polling place, who told me she could not direct me to the booth because she wasn't trained on how to do that. Luckily my neighbor who took me to the polls was there and volunteered to walk me over.

21. Voting privately and independently is an important right and responsibility that I want to be able to exercise in a confident and private manner. I am just as entitled to vote in

secret and choose whether to disclose my voting choices to someone else as a sighted voter. I should not have to disclose my voting choices in order to have the same voting privileges as everyone else.

22. I regularly use screen reader technology to read and complete forms and other documents. I should not have to ask someone else to complete a task that I am capable of doing myself with the correct, accessible technology.

23. I should also be able to abstain from voting in person to safeguard my health.

24. I am concerned that many people with disabilities will not be able to vote in Bexar County in the next election because of its refusal to provide accessible electronic ballots to all who need them.

I declare under penalty of perjury that the foregoing is true and correct.

Date: 4/25/2022

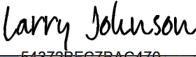
DocuSigned by:

54372BFC7BAC470...
Larry Johnson

Exhibit C

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LARRY JOHNSON, WENDY WALKER,
AMELIA PELLICCIOTTI;

§

§

§

NATIONAL FEDERATION
OF THE BLIND OF TEXAS; and

§

§

§

THE COALITION OF TEXANS
WITH DISABILITIES,

§

§

§

Plaintiffs,

§

Civil Action No.

§

vs.

§

§

§

JACQUE CALLANEN, in her official
capacity as the Bexar County Elections
Administrator; and BEXAR COUNTY, TEXAS

§

§

§

§

Defendants.

§

DECLARATION OF WENDY WALKER

I, Wendy Walker, am over 18 years of age and competent to make this declaration.

1. I reside in San Antonio, Bexar County.

2. I am legally blind.

3. I am President of the San Antonio chapter of the National Federation of the Blind of Texas (NFB), an elected role I have held for about a year and a half. I have also served on the chapter's board for about four years.

4. I use Job Access with Speech (JAWS) and NonVisual Desktop Access (NVDA) screen readers.

5. I am eligible for ballot-by-mail voting and would like to vote in future elections including the November 2022 general election using an accessible, mail-in ballot.

6. It is very important to me to vote privately and independently. But I cannot currently vote by mail because I would have to ask a friend to help me vote and ensure it is someone with similar political views particularly in the current political climate. In the past I have had to ask someone with polar-opposite political views fill out my ballot for me and it was very uncomfortable.

7. Because I knew the ballot-by-mail program was inaccessible, for the November 2020 election I had to find a sighted friend to drive me to my polling place for early voting and help me socially distance once there because of COVID-19.

8. I did not want to vote in person for the November 2020 election based on my prior in-person voting experiences. In at least two previous elections, the poll workers at the polling places I went to in Bexar County had no experience assisting a blind person with voting and did not know how to activate the machines. Even when I go back to the same polling place in Bexar County it is always laid out differently than the previous times — they never have any of the machines in the same spot and I have to find my way in a new place.

9. I also did not want to vote in person for the November 2020 election because I was concerned about contracting COVID-19 and had otherwise been very careful not to spend time in public places. At the polling place I had to wait in a long line with a lot of other people, try to stay socially distanced, but then touch a machine many other people had already touched.

10. There was only one staff person at the polling place who knew how to use the accessible voting machines. She was also in charge of all the other machines, so I had to stand and wait before she was able to assist me.

11. I had to bring my own headphones for sanitary reasons because of COVID-19. The headphones provided were also broken — the foam ear pads had completely fallen off and only the plastic part was left.

12. Even these experiences, I would like to vote by mail in the November 2022 election but do not want someone else filling my ballot out for me because I worry about them doing it incorrectly and having my ballot rejected. I am particularly concerned about this after reading that in the most recent,

March 2022 primary in Texas, more than 12 of mail-in ballots were rejected because of errors in how they were filled out.

13. I was unable to vote in the March 2022 primary because I did not want to have someone do it for me and I did not have the time I knew I would need after my experience trying to vote in person in the November 2020 election to do so. I also did not have transportation to get to the polls.

14. Asking someone else to do something I should be able to do myself with the technology available today is very frustrating, especially when I know Bexar County provides it to military members and other voters overseas.

15. It takes time and money for me to vote in person, to keep a safe distance from people, and to hope the polling person is trained so I can actually cast my ballot. This would all take me a couple of minutes on my computer if I had access to an electronic, accessible ballot.

16. I have heard presentations from vendors at the NFB conference on how the accessible voting technology works and is screen-reader friendly. The technology sounds very similar to the types of online accessible forms I regularly use with my screen reader.

I declare under penalty of perjury that the foregoing is true and correct.

Date: 4/25/2022

DocuSigned by:
Wendy Walker
AE05EE4501F44AE...
Wendy Walker

Exhibit D

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LARRY JOHNSON, WENDY WALKER,
AMELIA PELLICCIOTTI;

NATIONAL FEDERATION
OF THE BLIND OF TEXAS; and

THE COALITION OF TEXANS
WITH DISABILITIES,

 Plaintiffs,

§
§
§
§
§
§
§
§
§
§
§
§
§
§
§
§
§
§

Civil Action No.

vs.

JACQUE CALLANEN, in her official
capacity as the Bexar County Elections
Administrator; and BEXAR COUNTY, TEXAS

 Defendants.

DECLARATION OF A AMELIA PELLICCIOTTI

I, Amelia Pellicciotti, am over 18 years of age and competent to make this declaration.

1. I reside in San Antonio, Bexar County.
2. I am legally blind.
3. I am a member of the National Federation of the Blind (NFB) of Texas and have been since 2010.
4. I use the NonVisual Desktop Access (NVDA) and Job Access With Speech (JAWS) screen readers.
5. I am a registered Texas voter. I am eligible for ballot-by-mail voting and would like to vote in future elections, including the November 2022 general election, using an accessible, mail-in ballot.

6. I had to go to a polling place to vote in the November 2020 election because I did not receive an accessible absentee ballot.

7. I went even though I was very worried about contracting COVID-19 because I was not yet eligible to be vaccinated, and even though my past experiences voting in person in Bexar County had required dealing with untrained poll workers who did not know how to use the accessible voting machines, and other issues with the accessible voting equipment. For example, in the 2020 primary I tried going to the polling place closest to my house, but the headphone on the earpiece for the accessible voting machine was dangling by a wire. Another time, I voted at a polling place in Bexar County where it took an hour to cast my ballot because none of the poll workers had ever used or been trained on the accessible voting machine.

8. For the November 2020 election, a sighted friend drove me to the polling place and tried to help me socially distance while we waited in the line there. Once we got inside a poll worker grabbed me by the shoulder to lead me to the machine and I had to tell her I would prefer to get to the machine on my own.

9. I brought my own headphones because of sanitary concerns related to COVID-19.

10. The polling place only provided me with one plastic glove to wear while voting even though manipulating the machine required two hands. I was worried that touching the keys on the machine might transmit COVID-19 and I could not know whether the machine had been disinfected.

11. There was also only one poll worker who knew how to use the accessible voting machine and I had to wait until she was available to assist me. That poll worker got very close to make sure my ballot printed out, so it was not possible to socially distance to the extent I wanted.

12. I was fortunate my friend was available to drive me to vote on this particular day because the polling place closest to my home is off a freeway and unsafe to walk to and I could not have taken public transit all the way there.

13. I have seen accessible ballot technology at NFB conventions. At one NFB exhibit hall I was able to try a mock-up accessible ballot on a computer. The technology is easy to use and similar to the types of accessible, fillable PDFs I regularly use for medical forms.

14. I know that Bexar County provides similar electronic ballots to service members and other voters who are overseas.

15. I was not able to vote in the March 2022 primary because I would have had to take the bus to the polling place. Had I had an accessible mail-in ballot, I would have voted, but instead I had to make the choice to save my transportation budget and time to vote in November.

16. I intend to vote in the November 2022 election and would prefer to vote by an accessible, electronic vote-by-mail ballot.

17. If I were to vote by mail without an accessible ballot, I would have to have a sighted friend fill out my ballot. It is very important to me to vote privately and independently. I do not want to share my voting choices with friends because that is supposed to be private information. I am also concerned about someone filling my ballot out incorrectly and having it rejected.

18. Being able to vote using an accessible electronic ballot would allow me to vote in all elections, would protect my private vote, and would not require worrying about the cost of arranging transportation to and from the polls or dealing with untrained poll workers.

I declare under penalty of perjury that the foregoing is true and correct.

Date: 4/25/2022

DocuSigned by:
Amelia Pellicciotti
3D332E9CC7DE4BF...
Amelia Pellicciotti

Exhibit E

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LARRY JOHNSON, WENDY WALKER,	§	
AMELIA PELLICCIOTTI;	§	
	§	
NATIONAL FEDERATION	§	
OF THE BLIND OF TEXAS; and	§	
	§	
THE COALITION OF TEXANS	§	
WITH DISABILITIES,	§	
	§	
Plaintiffs,	§	Civil Action No.
	§	
vs.	§	
	§	
JACQUE CALLANEN, in her official	§	
capacity as the Bexar County Elections	§	
Administrator; and BEXAR COUNTY, TEXAS	§	
	§	
Defendants.	§	

DECLARATION OF NORMA CROSBY

I, Norma Crosby, am over 18 years of age and competent to make this declaration.

1. I reside in Alvin, Texas.
2. I am legally blind.
3. I am the President of the National Federation of the Blind of Texas, an elected role I have served in since 2014. I have also served on the National Federation of the Blind’s (NFB) Board of Directors since 2015.
4. The NFB of Texas has approximately 500 members in Texas, including many blind and print-disabled members who are registered to vote in Bexar County, eligible to vote by mail, and who wish to vote in upcoming elections by independently casting a private mail-in ballot.
5. The NFB of Texas is the Texas affiliate of the National Federation of the Blind. The NFB of Texas is a 501(c)(3) non-profit membership organization composed of blind Texans

and their families and friends. The organization promotes the general welfare of the blind by assisting the blind in their efforts to integrate themselves into society on terms of equality and by removing barriers that result in the denial of opportunity to blind persons in virtually every sphere of life, including education, employment, family and community life, transportation, and recreation.

6. The NFB of Texas' goal of complete integration of the blind into society on a basis of equality includes removal of legal, economic, and social discrimination. The NFB of Texas advances its members' right to participate fully and equally in all aspects of their lives, including by ensuring its blind members can vote on equal footing with every other Texan. Among other efforts, the NFB of Texas has worked to ensure the blind have an equal opportunity to vote on the same terms as other Texans.

7. Over the past three years the NFB of Texas has advocated for accessible, electronic ballots for blind voters and print-disabled voters with officials at the state and local level, including in Bexar County through our San Antonio Chapter President, Wendy Walker. Thus far, no changes have been made to make mail-in ballots available electronically and accessibly to blind people.

8. I am familiar with the systems used by U.S. states and commonwealths, include counties within the State of Texas, to facilitate overseas voting for military members, their families, and U.S. citizens living overseas, under the Uniformed and Overseas Citizens Absentee Voting Act and the Military Overseas Voter Empowerment Act.

9. In Texas, counties use a variety of systems to allow members of the military and other citizens living overseas to receive their absentee ballots in an electronic format. Some deliver Adobe pdf versions of the ballots by email. If extended to individuals with print disabilities in Texas and made accessible and fillable, these pdfs would allow individuals with print disabilities to use assistive technology software to read and mark their absentee ballots.

10. In addition, several Texas counties, including Bexar County, use electronic systems to deliver accessible, markable electronic versions of the ballots to overseas voters. If made available to voters with print disabilities, these systems would be ready-made to accommodate disabled voters.

11. Through my work on the NFB National Board of Directors and with other state affiliates, I know that several states, including Colorado, New York, and Michigan are already providing blind and print-disabled voters with accessible, electronic ballots.

12. Bexar County Elections Administrator Jacquelyn (Jacque) Callanen has testified that Bexar County uses an electronic ballot system for military and overseas voters that is electronic and accessible and that, if extended to voters with print disabilities would allow them to use screen reader software to read their ballots and allow them to cast absentee ballots in a more private, independent manner.

13. If voters with disabilities in Bexar County were able to request accessible electronic absentee ballots — as military and overseas voters already may do — such that they could read the ballot and mark their selections using their own assistive technology — they could vote privately and independently in the November 2022 election.

14. Without access to the County's electronic ballot system, voters with print disabilities in Bexar County face the threat of being excluded from voting in the November 2022 election. These voters face the unacceptable choice of (1) venturing to the polls in-person to cast a vote, at risk of exposure to COVID-19; (2) obtaining assistance from a third party in order to complete a paper absentee ballot, thus depriving them of their right to vote secretly and independently; or (3) foregoing voting all together.

15. An accessible, electronic ballot is critical for allowing our members to vote by mail because paper mail-in ballots require assistance from a sighted person. I have heard from members that they have privacy concerns about sharing their vote with someone else and that they are worried an assistant will not mark their ballot correctly. This privacy concern was made worse by a 2021 Texas law that requires mail-in ballot envelopes include the voter's state ID number or the last four digits of their

social security number (and that it match the specific number they submitted with their registration) in order to be counted.

16. NFB of Texas has heard from members who are registered to vote in Bexar County and are eligible to vote by mail that they want to cast their ballots by mail privately and independently in upcoming elections but will not be able to unless an accessible electronic system is available.

17. I have also heard from our members that repeated problems with voting in person make accessible, mail-in voting even more critical for them to actually be able to vote. Many members have experienced long waits because of limited or no assistance at the polling place and dealing with poll workers who have no idea how to assist an individual with a disability from check in all the way through the voting process.

18. Another reason members need an accessible mail-in option is because many blind people have other, immunocompromising medical conditions that are part of their disability and that make them especially concerned about voting in person during the pandemic.

19. The NFB believes it is critical that we as blind and print-disabled individuals not be treated as second-class citizens and have the same right to private votes as sighted people.

20. I am concerned that many people with disabilities will not be able to vote privately and independently by mail-in ballot in Bexar County in the next election because of its refusal to provide accessible, electronic ballots to all who need them.

21. The NFB of Texas is ready and willing to assist Bexar County in making accessible electronic ballots available to blind voters in time for the next election.

I declare under penalty of perjury that the foregoing is true and correct.

Date: 4/25/2022

DocuSigned by:
Norma Crosby
FBB769D56BF740F...
Norma Crosby

Exhibit F

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LARRY JOHNSON, WENDY WALKER,
AMELIA PELLICCIOTTI;

NATIONAL FEDERATION
OF THE BLIND OF TEXAS; and

THE COALITION OF TEXANS
WITH DISABILITIES,

Plaintiffs,

vs.

JACQUE CALLANEN, in her official
capacity as the Bexar County Elections
Administrator; and BEXAR COUNTY, TEXAS

Defendants.

§
§
§
§
§
§
§
§
§
§
§
§
§
§
§
§
§
§

Civil Action No.

DECLARATION OF CHASE EARDEN

I, Chase Bearden, am over 18 years of age and competent to make this declaration.

1. I reside in Austin, Texas.

2. I am the Deputy Executive Director of the Coalition of Texans with Disabilities (CTD) a role I have held since 2019. Before that I was the Director of Advocacy and Community Organizing at CTD for ten years.

3. CTD has more than 3,500 individual members in Texas and 208 affiliate organizational members, including many blind and print-disabled members who are registered to vote in Bexar County, who are eligible to vote by mail, and who wish to vote in upcoming elections by independently casting a private mail-in ballot.

4. CTD is a member-driven cross-disability organization that brings together individual members and affiliate organizations across the state to engage in advocacy, education, and professional disability consulting.

5. CTD has spent more than five years advocating for accessible, mail-in ballots for Texas voters including in Bexar County.

6. It is important to our members to be able to vote privately and independently. But that is not possible under the current system.

7. We have heard from many members with vision impairment and print disabilities that they do not want to have someone else fill out their ballot for them when they could do so using their own screen reader devices with an accessible ballot.

8. Our members are also concerned about having someone—even a family member or close friend—fill out their ballot for them because of differing political views and or the strict requirements Texas ballots must satisfy to be counted.

9. Before, and particularly during the pandemic, our members did not want to risk voting in person for health reasons.

10. Our members with vision impairment and print disabilities also frequently have issues voting in person because of difficulty finding transportation to get to their polling place and accessibility issues once they arrive. Every election cycle we get calls from members who spent more than an hour waiting to vote because the poll workers at their polling place couldn't find headphones for the accessible voting machine or didn't know how to actually work the machine. Without headphones our members with vision impairment and print disabilities have to rely on poll workers to read them the entire ballot and often press the buttons for them.

11. On February 3, 2022, I participated in a call organized by State Senator Jose Menendez, the Texas Secretary of State’s Office, and Bexar County Elections Manager Jacque Callanen. During that call the officials were asked about making accessible, mail-in ballots available for the next election. Ms. Callanen replied that Bexar County was the first county to pilot electronic ballots for military members voting overseas but made no specific commitment about extending that option to voters with vision impairments and print disabilities.

12. Several Texas counties, like Bexar County, use electronic systems to deliver accessible, markable electronic versions of the ballots to overseas voters. If made available to voters with print disabilities, these systems would be ready-made to accommodate disabled voters.

13. Our members should not have to choose between using an assistant to vote either in person or at home or dealing with accessibility issues at a polling place in order to exercise their right to vote confidentially and independently.

14. I am concerned that many people with disabilities will not be able to vote privately and independently by mail-in ballot in Bexar County in the next election because of its refusal to provide accessible, electronic ballots to all who need them.

15. The CTD is ready and willing to assist Bexar County in making accessible electronic ballots available to blind voters in time for the next election

I declare under penalty of perjury that the foregoing is true and correct.

Date: 4/25/2022

DocuSigned by:

C1E7145224DE487...
Chase Bearden