

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

SHANNON PEREZ, et al., )  
)  
*Plaintiffs,* )  
)  
- and - )  
)  
EDDIE BERNICE JOHNSON, et al., )  
)  
- and - )  
)  
TEXAS STATE CONFERENCE OF )  
NAACP BRANCHES, et al., )  
)  
*Plaintiff Intervenors,* )  
)  
v. )  
)  
RICK PERRY, et al., )  
)  
*Defendants,* )

CIVIL ACTION NO.  
SA-11-CA-360-OLG-JES-XR  
[Lead case]

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MEXICAN AMERICAN LEGISLATIVE )  
CAUCUS, TEXAS HOUSE OF )  
REPRESENTATIVES (MALC), )  
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*Plaintiffs,* )  
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- and - )  
)  
HONORABLE HENRY CUELLAR, et al., )  
)  
*Plaintiff Intervenors,* )  
)  
v. )  
)  
STATE OF TEXAS, et al., )  
)  
*Defendants* )

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CIVIL ACTION NO.  
SA-11-CA-361-OLG-JES-XR  
[Consolidated case]

TEXAS LATINO REDISTRICTING TASK )  
FORCE, et al., )  
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 *Plaintiffs,* )  
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 v. )  
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 RICK PERRY, et al., )  
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 )  
 *Defendants,* )  
 )

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CIVIL ACTION NO.  
SA-11-CA-490-OLG-JES-XR  
[Consolidated case]

MARAGARITA v. QUESADA, et al., )  
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 *Plaintiffs,* )  
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 v. )  
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 RICK PERRY, et al., )  
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 *Defendants,* )  
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CIVIL ACTION NO.  
SA-11-CA-592-OLG-JES-XR  
[Consolidated case]

JOHN T. MORRIS, )  
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 *Plaintiff,* )  
 )  
 v. )  
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 STATE OF TEXAS, et al., )  
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 )  
 *Defendants,* )  
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CIVIL ACTION NO.  
SA-11-CA-615-OLG-JES-XR  
[Consolidated case]

EDDIE RODRIGUEZ, et al.,	)	CIVIL ACTION NO.
	)	SA-11-CA-635-OLG-JES-XR
	)	[Consolidated case]
<i>Plaintiff,</i>	)	
	)	
v.	)	
	)	
STATE OF TEXAS, et al.,	)	
	)	
<i>Defendants.</i>	)	

**SUMMARY OF CLOSING ARGUMENTS FOR  
THE 2011 HOUSE PLAN PHASE OF TRIAL BY  
TEXAS LATINO REDISTRICTING TASK FORCE, ET AL.**

Pursuant to the Court’s Order issued during trial on July 19, 2014, Plaintiffs Texas Latino Redistricting Task Force, et al., hereby submit their summary of closing arguments to be presented regarding evidence on the 2011 House Plans on August 11, 2014. In filing this summary, Task Force Plaintiffs neither waive nor limit themselves to the arguments contained or evidence referenced.

**I. Overview**

The reapportionment of Texas State House districts during the 82<sup>nd</sup> Legislature in 2011 took place following a decade of immense population growth in the state. The 2010 Census results were released, and Texas gained four new congressional seats, more than any other state. Growth in the Latino population drove Texas’s population growth. In South and West Texas, where there is already a majority Latino population, the Latino population expansion is even greater. Latinos also grew in urban areas like Harris County (1,669,723, or 40% of total

population, as of 2010)<sup>1</sup> and the Dallas-Fort Worth Metroplex (in 2010, over 1 million Latinos in Dallas and Tarrant Counties)<sup>2</sup>.

Latino population growth naturally gave rise to the opportunity and in some areas concomitant federal law obligation to create additional districts with a Latino majority. But at every turn, when faced with a choice whether to create a Latino opportunity district in the State house plan, Texas redistricters refused to do so. Texas also chose to eliminate a Latino opportunity district in South Texas, resulting in a State House map that created one fewer Latino opportunity district when compared to the benchmark.

Texas has enacted then been forced to remedy discriminatory redistricting plans in every decade since the 1970's. Against this backdrop, and heightening the sophistication of its tactics, it again enacted a discriminatory House plan in 2011.

## **II. Discriminatory Intent**

The Court in this case is well aware of the path taken in examining state action for invidious discriminatory purpose using the *Arlington Heights* factors: (1) discriminatory impact, (2) historical background, (3) sequence of events leading up to the decision, (4) procedural or substantive deviations from the normal decisionmaking process, and (5) contemporaneous viewpoints expressed by the decisionmakers. This phase of trial supplemented the already strong evidence of these factors' presence with regard to the House maps. The Court received additional testimony regarding the sequence of events leading up to the passage of the House map H283 and the procedural and substantive deviations from the normal policies and decision-making process.

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<sup>1</sup> See Exhibit PL 301.

<sup>2</sup> See Exhibits PL 294 and 300.

At every turn, obligations under the Voting Rights Act were deliberately contravened for discriminatory purpose. The theme underlying this decade's purposeful discrimination is encapsulated in the "nudge factor" email that describes a technique that could be employed "nudge" down the Latino opportunity to elect in certain districts by targeting lower turnout Latino precincts for inclusion in a district while maintaining the overall Hispanic Citizen Age Population. The result was to reduce performance by a few percentage points in an effort to bolster the reelection of candidates who were not the Latino candidates of choice, like former Representatives Dee Margo in El Paso and John Garza in Bexar County. In other words, the tactic would leave a district appearing to be an opportunity district while in reality curbing and diluting the electoral strength of Latino voters. State defendant, faced with the damning email, attempted to prove that the data requested in the email was not available. While Plaintiffs dispute that conclusion, the State misses the point. The email contains the idea, the tactic, the result desired. The mappers who testified acknowledge that RedAppl contains all of the data needed to employ the tactic and achieve the result – population data, SSVR, and aggregated election results, all of which scroll by the mapper as he clicks precincts or census blocks in and out of a district. Redistricters used racial and electoral data when they went below the precinct level in RedAppl to split precincts and assign individual blocks in and out of districts to achieve the "nudge factor" results.

Where the tactic was used to split precincts, State Defendants offered no alternative credible explanation. For example, the State's witnesses offered no credible alternative explanation for the splitting of voter tabulation districts (VTD) in El Paso, where redistricters managed to take a district—House District 78—slightly below the benchmark level of Spanish-Surname Voter Registration percentage in a county whose population is overwhelmingly Latino,

and where alternative configurations were considered and discarded. The testimony of Senator Jose Rodriguez and Representative Joe Moody brought to light the inexplicably odd shape that was given to the border between HD 77 and 78, which divides communities with common interests and socio-economic characteristics.

The redistricting of the Texas House map was also riddled with substantive and procedural deviations. The lead staffers in the redistricting process, Ryan Downton and Gerardo Interiano, were lawyers with no background in redistricting, election law, or the Voting Rights Act. The map drawers worked outside of public view until Chairman Solomons released the statewide plan on April 13, 2011. Then the plan was swiftly heard and passed out of committee. Other peculiarities were rife within the process leading to the passage of H 283 map. Redistricting staff and representatives exchanged e-mails in personal accounts rather than state accounts, arguing that it was done because they dealt with political rather than legislative business. Staff bypassed Senate and House committees members and leaders in the finalization of the maps. Also, hearings were held with little notice and were compressed into an extremely short time period. The House Redistricting Committee never held a hearing to take public comment on the plan that was actually passed by the Committee. Notice for the May 6, 2011 public hearing on the House plan by the Senate Select Redistricting Committee was provided less than 48 hours before the hearing.

Texas offers case-by-case justifications for its refusal to create new Latino districts but it does not address the overall result of its decisions. In El Paso, State Defendants argue that the drop in county map was never examined for possible Voting Rights Act violations because a county delegation drew each map in a “member-driven” process. However, the El Paso map was clearly altered following the delegation’s submission, 14 precinct were subsequently split for no

lawful reason, and the resulting map raises the inference that the “nudge factor” was at play. In Bexar, Mr. Interiano and John Garza’s staff worked meticulously to create a map with 50.1% SSVR, but in which aggregated election results demonstrate that fewer Latino-preferred candidates were elected. State Defendants offer explanations for the resulting Bexar county map that are either contradictory or not borne out by the evidence, such as Mr. Garza’s desire to represent Bexar Met areas. Again, the evidence strongly suggests that the “nudge factor” was at work.

Plaintiffs have presented credible evidence on each of the Arlington Heights factors, sufficient for this Court to conclude that several of the districts in H283, the 2011 House map, were created with discriminatory purpose.

### **III. Vote Dilution**

Under *Thornburg v. Gingles*, Section 2 of the Voting Rights Act requires the creation and/or maintenance of Latino opportunity districts in areas experiencing racially polarized voting where a majority HCVAP, reasonably compact, district can be drawn. There is little dispute that racially polarized voting occurs throughout Texas, and that there is abundant evidence pertaining to the Senate Factors relevant to determining whether, under the totality of circumstances, a Section 2 violation has occurred. Compliance with Section 2 required Texas to create new Latino opportunity districts in El Paso County, Harris County, and the Valley, and to maintain the second Latino opportunity district in Nueces County. All of those districts easily met the *Gingles* preconditions. The State failed to comply, and may have failed entirely to even consider Section 2 compliance, allowing its preoccupation with Section 5 retrogression standards to obscure its obligations under Section 2.

Gerardo Interiano, primary mapper for the Speaker of the House Joe Strauss, testified that although he had the overall responsibility of ensuring compliance with Section 2, he never considered whether a drop-in county should include an additional Latino-majority district under Section 2. Rather, he testified that the mappers simply dropped each county map created by a county delegation of Representatives into the statewide map. Former Representative Burt Solomons, who served as the House Redistricting Committee Chair, testified that he relied on staff, including Mr. Interiano and Mr. Downton, to understand the implications of the Voting Right Act. Chairman Solomon couldn't say whether the Voting Rights Act would require Texas to draw additional opportunity districts under certain circumstances, and he testified that he personally did nothing to determine whether it was *possible* to draw additional minority districts, let alone required. Thus, it is not surprising that Chairman Solomons testified that he would need a Federal Court to tell him to regard the Voting Rights Act above the State county line rule; absent a federal court ruling to the contrary, the county line rule would prevail. Gerardo Interiano may have had a similar misapprehension regarding the state law rule, as he testified that although he actually created a Latino majority district in the Valley, he decided not to include it in the final House plan because it would violate the county line rule. Similarly, Mr. Interiano testified that, at Chairman Solomons' direction, he elevated the county line rule over Section 2 in drawing the maps in Nueces County, and never considered the possibility of Section 2 districts in El Paso and Harris, again because they were drop-in counties. Indeed, Mr. Interiano claimed he never looked at how many Latino opportunity districts should be drawn in the 2011 House plan; he never performed a section 2 analysis. Ryan Downton testified that he knew that a Latino opportunity district could be drawn by combining the surplus population in Cameron and Hidalgo counties, but it was a "policy decision" not to do so.

All of this seemingly deliberate indifference to potential Section 2-based gains occurred despite the fact that the Texas Legislative Council instructed the 2011 redistricters that the county line rule would have to yield to federally mandated Section 2 districts. Redistricters plainly ignored that legal advice, and ignored the vote dilution that occurred as a result of violations under Section 2 of the Voting Rights Act.

#### **IV. El Paso**

El Paso County is a drop-in county, and the delegation that Chairman Solomons charged with drawing its five districts was led by his friend, Representative Pickett. An *Arlington Heights* inquiry into the evidence reveals a clear pattern, unexplainable on grounds other than race, that emerges from the sequence of events leading to the final “antlers” configuration that splits 14 precincts on the boundary between HD77 and HD78.<sup>3</sup>

Representative Pickett testified that he worked with the delegation to arrive at two El Paso drafts, Version 1 (SOLOH109)<sup>4</sup> and Version 2 (SOLOH110),<sup>5</sup> which he shared with Chairman Solomons. Neither of the two versions contained split precincts on the boundary between HD77 and HD78. Version 1 (SOLOH109), Representative Pickett’s preferred plan, has no western antler, a “chef’s hat” shape at the top of the eastern antler, is more compact than Version 2 (SOLOH110), and includes higher performance results in aggregated elections for candidate Molina’s 2006 Criminal Court race. Chairman Picket testified that the “chef’s hat”—Version 1—most closely resembles what he submitted to the House Redistricting Committee. Bonnie Bruce, Chief of Staff to Chairman Solomons and Committee Clerk for the House

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<sup>3</sup> See Exh. PL 684

<sup>4</sup> See Exh. PL 504

<sup>5</sup> See Exh. PL 505

Redistricting Committee, confirmed that Representative Pickett preferred Version 1. Despite receiving both versions from Chairman Solomons on March 23, it was the less compact, dual-antler, El Paso Version 2 that Ryan Downton used as his starting point for the final configuration, a version that had lower SSVR and lower performance numbers for 2006 Molina race than did Version 1.

Mr. Downton testified that in making the split precinct alterations, he used census block data. As he moved blocks in and out of HD 77 and HD 78, he tracked the effect of the changes not only on racial composition, but on political data, including aggregated election results. Mr. Downton testified that his purpose for altering the boundaries between HD77 and HD78, alterations that resulted in 14 split precincts, was solely to bring the SSVR of HD78 to the benchmark level of 47.5% SSVR. However, Task Force Plaintiffs demonstrated during Mr. Downton's cross examination that HD78's SSVR could be slightly increased over the benchmark by the simple swapping of 5 whole precincts between the two districts. Not coincidentally, this more compact whole-precinct configuration also resulted in a HD 78 with better performance numbers for the 2006 Molina race than did the antlers split-precinct version that Mr. Downton included in the final H283 map.<sup>6</sup>

The State's proffered reasons for the final configuration are constantly shifting, from justifications based on partisan politics to equalizing population, geographical considerations to the Voting Right Act retrogression standards. However, Mr. Downton testified that his reasons for altering the district were neither partisan nor directed at equipopulousness, and that he never spoke to either of the Representatives of HD 77 and HD 78 while he was making the alterations. The maps themselves demonstrate that the final antlers version of HD 77 does not follow the

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<sup>6</sup> See Exh. PL 1007

geographic lines of the mountains. Moreover, both Version 1(SOLOH109) and the in-court demonstrative version of HD 77 and HD78 slightly *increase* the HD 78 SSVR 47.5% benchmark, while Mr. Downtown’s final antlers version misses the HD 78 SSVR benchmark, if only slightly (47.1% SSVR).

Finally, the RedAppl account for Speaker Strauss demonstrates that someone in his office, likely Gerardo Interiano whose recollection is fuzzy but who was the primary user of that account, had some voting rights concerns about the final configuration and was viewing, if not designing an extremely compact district, shaped like a space capsule, on the evening of April 13, 2011.<sup>7</sup> The log entry for the space capsule HD 77 reads “El Paso – VRA,” and the plan contains no split precincts and raises the SSVR of HD 78 to 52.6%, exceeding all other versions considered. In addition, the results of the reaggregated 2006 Molina race for Criminal Court in the compact space capsule plan shows Molina garnering a majority of the vote in both districts (57.9 % of the vote in HD 77, and 51.7% of the vote in HD 78).

This sequence of events, combined with Mr. Downton’s admission that he was viewing and considering electoral results as he was splitting the precincts, provides strong circumstantial evidence that he was using the “nudge factor” to depress potential performance for the Latino preferred candidates while attempting to maintain the 47.5% SSVR benchmark to avoid federal court scrutiny.

## **V. Bexar County**

The 2011 reapportionment of State House Districts in Bexar County resulted in a House District 117 designed to prevent Latinos from electing their candidate of choice. The chief architects of HD 117 were former House Representative John Garza and Gerardo Interiano. Mr.

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<sup>7</sup> See Exh. PL 517

Interiano excised and incorporated precincts in a manner that made the district appear to be a Latino opportunity district but drove down the ability of a Latino candidate of choice to be elected.

The proposed plan for House Districts in Bexar County was supposed to be a “drop-in” map resulting from the work of the county delegation. Representative Mike Villareal was vice-chair of the House redistricting committee, a member of the Bexar County delegation and taking the lead on creating a consensus redistricting plan for the Bexar delegation. Rep. Villareal told then-Representative John Garza that Hispanic voting strength of the initial Garza plan was too low. Rep. Villareal drafted a series of proposals for HD117 that had Molina in the 2006 Criminal Court of Appeals General Election garnering over 50% of the district’s votes. Mr. Garza ignored Rep. Villareal’s proposals.

Chairman Burt Solomons, the House Redistricting Chair, testified that the representatives from the “drop-in” counties were asked to draw consensus maps on their own. Mr. Interiano acknowledged that this process was in place but did not follow it. Working outside of the delegation’s process and departing substantively from normal procedure guided by Rep. Villareal, Mr. Garza worked with Mr. Interiano to shape a map that would result in his reelection. Mr. Garza’s goal was to get a district that strengthened his performance, which included taking his district farther north to encompass more Anglo and conservative voters. Mr. Garza acknowledged that in the north, turnout was higher and HCVAP was lower, while in the southern and rural parts of the county turnout was lower and HCVAP higher. Mr. Interiano conceded that drawing HD 117 was a balancing act of trying to meet both demographic and political goals. Mr. Interiano and Mr. Garza drew their own version of 117 with lower

performance for the Latino preferred candidate. Rep. Villarreal incorporated the Interiano and Garza version into the map.

State Defendants' defense of the configuration of HD 117 in H283 is that, as Mr. Interiano testified, Garza wanted to be in a rural area to represent voters in the Bexar Met Water District service area. However, Mr. Garza had no idea where the Bexar Met service area was and he had no redistricting goals with respect to the Bexar Met service area. Furthermore, a review of the Bexar Met service area in 2010 lends no credence to this defense because the precincts that HD 117 took in do not track the lines of the service area. See Exh. PL 996 (Map - Bexar Met Service Area 6-21-2010). The Bexar Met service area goes inside Loop 410 into the South Side of San Antonio but the 2011 House Plan pulls 117 out of this area.

Areas that Mr. Garza targeted for incorporation into HD 117 were two communities called Somerset and Whispering Winds, communities of low voter turnout and high Latino concentration that Mr. Garza never visited and about which he knew little. Rep. Joe Farias, on the other hand, expressed his desire during redistricting to keep Whispering Winds and Somerset because he had worked to improve services to these underserved communities. Rep. Farias campaigned in these communities and offered an amendment to keep them in his district. During his representation of these communities, Rep. Farias noted the concern of his constituents in Whispering Winds and Somerset with the service provided by Bexar Met Water and voted to abolish the Bexar Met Water District Board.

Rep. Villarreal's drafts show stronger performance by Candidate Molina in the 2006 Criminal Court of Appeals General Election while Mr. Garza and Mr. Interiano were working on a different map—one that ended up with the greatest gap between CVAP and SSVR in the State. The departure from the procedure established by the committee and the final result regarding the

gap between CVAP and SSVR indicate that Mr. Interiano was using the nudge factor to create a district exactly at 50.1% SSVR but that was unlikely to elect the Latino candidate of choice.

## **VI. Rio Grande Valley**

The 2011-enacted House Plan, H283, failed to create an additional district in the Rio Grande Valley. Specifically, there was no district added to the six that existed there previously that would have been wholly contained within Cameron and Hidalgo Counties. This region has experienced immense growth in population, and that population is overwhelmingly Hispanic (90% in Hidalgo and 88% in Cameron in 2010).<sup>8</sup> This Court's interim maps for Cameron and Hidalgo Counties created an additional district wholly contained within the two counties. The testimony presented showed a great need for additional representation of a region that unique needs and great potential for economic growth.

Michael Seifert testified that increasing political participation and representation result in improvements to infrastructure and public services, as well public investment in education. Mr. Seifert discussed the issues faced by underserved communities like the colonias in the Valley. With added representation, however, public services and infrastructure for communities like Cameron Park can be improved. He added, however, that more representation was always needed.

Additionally, Representative Jose Manuel Lozano expressed his belief during the 82<sup>nd</sup> Legislature's Sessions in 2011 that an additional district should be drawn into the Rio Grande Valley.

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<sup>8</sup> See previously admitted Task Force Exhibits PL 296 and 298.

The gains created by this Court for Cameron and Hidalgo Counties in terms of access to the political process in the State House of Representatives should be maintained.

## **VII. Nueces County**

Latino population growth in Nueces County exceeded its total population growth, and Latinos now comprise 60% of its population. Latino voters in the county are highly cohesive in support of Latino candidates, a preference not shared by non-Latino voters, whether Democrat or Republican. The record is replete with evidence of historical discrimination in Nueces County, as well as present day social, economic, and educational disparities that resulted therefrom. Because of population shifts, Nueces County became a “drop in” county, that is, a county that would neatly fit two whole House districts. However, over the previous decade, the county had encompassed nearly three districts, two of which contained a majority Hispanic Citizen Voting Age Population. Placing only two House districts wholly within Nueces County in H283 resulted in the loss of one HCVAP majority district – HD33.

All three of the much-discussed “Hanna retrogression memos,” April 6, April 12, and April 20, 2011,<sup>9</sup> alerted the State to the “difficult retrogression issue” presented by the elimination of a Hispanic district in Nueces, and offered several alternatives, one of which was to allow the county line rule to yield to the Voting Rights Act to preserve the second Hispanic district in Nueces County.

Gerardo Interiano testified that the Texas county line rule was elevated over Section 2 of the Voting Rights Act in the final map, even though he was aware that he could have drawn an

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<sup>9</sup> See Pl. Ex. 260; US Ex. 188; D.Ex. 123

additional Section 2 district in Nueces County by crossing the county line. Indeed, Mr. Interiano testified previously that although the overall responsibility of ensuring compliance with Section 2 rested with him, he never considered whether any drop in county should include an additional Hispanic opportunity district under Section 2, but simply “dropped in” the county configurations into the map. He was unable to articulate why the decision to allow the state rule to trump federal voting rights was made by Chairman Solomon, who testified previously that he could not remember whether it would have been possible to draw two Hispanic opportunity districts by crossing a county line.

Although we cannot know every motivation for the elimination of the Hispanic opportunity district in Nueces County, what is clear is that by choice or by negligence, the mappers and Chair of the House Redistricting Committee ignored their duty to determine whether Section 2 of the Voting Rights Act trumped the state county line rule. Indeed, they had evidence, including the presence of racially polarized voting and the ability to draw a compact Latino opportunity district, but chose to ignore it. Under these circumstances, the county line rule must yield to the federal protections afforded to Hispanic voters under Section 2 of the Voting Rights Act.

### **CONCLUSION**

Despite a demographic sea-change in relation to Latinos in the state, Texas chose either not to create, or to eliminate, Latino-majority districts. Texas also created sham Latino districts, artfully crafted to contain slight Latino majorities but also deliberately designed to reduce the ability of Latinos to elect their candidate of choice. State Defendants proceeded with the elimination of Latino opportunity districts and creation of sham districts outside of the normal

redistricting process and with ample knowledge of their failures to comply with federal law and the United States Constitution.

DATED: July 25, 2014

Respectfully submitted,

MEXICAN AMERICAN LEGAL DEFENSE  
AND EDUCATIONAL FUND

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**CERTIFICATE OF SERVICE**

The undersigned counsel hereby certifies that she has electronically submitted a true and correct copy of the above and foregoing via the Court's electronic filing system on the 25th day of July, 2014. The undersigned counsel hereby certifies that she caused a true and correct copy of the above and foregoing to be e-mailed and/or facsimile to the persons listed below by the close of the next business day.

/s/ Nina Perales

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