



Standing for Faith, Family, and Freedom in Texas

Mr. Richard L. Barron, II
Williamson County Election Administrator
301 S.E. Inner Loop, Suite 104
Georgetown, Texas 78626

October 31, 2012

To Whom It May Concern:

This letter is to inform you that a Williamson County resident and voter, Ms. Alva "Kay" Hill requests that Williamson County put an immediate end to the policy of banning and/or forcing voters to conceal t-shirts with the words "Vote the Bible." If Williamson County does not cease this unlawful policy immediately, Ms. Hill is prepared to file a complaint with the Texas Secretary of State's office, against, you, Mr. Richard (Rick) Barron, the Williamson County Election Administrator, and Williamson County election workers at the Taylor City Hall polling place on the morning of October 24, 2012, for actions against her during early voting for the general election on that same day. Ms. Hill's right to vote was infringed upon by Williamson County election workers at the Taylor City Hall polling place on the morning of October 24, 2012 as she was not allowed to vote because she was wearing a t-shirt that had the words "Vote the Bible" written on the front of her t-shirt. Ms. Hill believes her right to free speech and free exercise of religion was infringed upon as she was forced, by Williamson County election workers at the Taylor City Hall polling place, to conceal the words "Vote the Bible" on her t-shirt in order to vote, in violation of the United States Constitution, the Texas Constitution, and Chapter 110 of the Texas Civil Practices and Remedies Code (Texas Religious Freedom Restoration Act). One female Williamson County election worker at the Taylor City Hall polling place on October 24, 2012 said the words on Ms. Hill's t-shirt "may be offensive." Later that same morning, Ms. Hill spoke over the phone with Williamson County Election Administrator, Rick Barron, and Mr. Barron confirmed the decision by the election worker to ban the "Vote the Bible" t-shirt. Efforts to claim that the words "Vote the Bible" amount to "electioneering" as defined in the Texas Election Code are misplaced and have no basis in law. Electioneering only prohibits supporting or opposing a candidate, measure, or political party, so "Vote the Bible" doesn't fit within this definition. Ms. Hill is prepared to formally request that the Texas Secretary of State's office review this matter and take action to ensure that this injustice does not occur again, if Williamson County does not remedy this matter.

On the morning of Wednesday, October 24th, Alva "Kay" Hill went to early vote by herself at Taylor City Hall in Taylor, Texas. Ms. Hill was wearing a t-shirt with the words "Vote the Bible" written on the front of her t-shirt. There were no other words on Ms. Hill's t-shirt. Ms. Hill approached an election worker at the Taylor City Hall polling place and Ms. Hill handed her voter registration card to the election worker. A female election worker (hereinafter referred to as "EW1") was standing up and said to Ms. Hill "[i] am going to have to ask you to turn your shirt inside out so the words are covered up because the words on

your shirt may be offensive to some people." Ms. Hill then said "what?" EW1 then repeated the statement that some people may be offended by the words "Vote the Bible." Ms. Hill then said "I really don't want to do that, it's not like my shirt says Republican or Democrat." EW1 also said to Ms. Hill "or you could go home and change." Ms. Hill again said "I really don't want to do that." EW1 went on to say that "the wording on the t-shirt has got to be covered up" in reference to the only words on Ms. Hill's t-shirt, "Vote the Bible." Ms. Hill said "well I didn't wear a jacket." Another female election worker (hereinafter referred to as "EW2") then said, "[o]h, I have a jacket, here's my jacket" and then Ms. Hill put on the jacket as she believed she had no other choice in order to vote. Ms. Hill put on the jacket and EW1 helped Ms. Hill close the jacket to specifically cover up the words "Vote the Bible" on Ms. Hill's t-shirt.

Ms. Hill was very shocked, embarrassed, humiliated and intimidated by the actions and statements of the Taylor City Hall election workers and it was clear to Ms. Hill that she would not be allowed to vote if she did not remove or cover up the words on her t-shirt that read "Vote the Bible." Ms. Hill then voted, gave the jacket back to the election workers, and left the Taylor City Hall. Due to the high level of embarrassment, humiliation, intimidation and fear of retaliation, Ms. Hill was unable to return to the Taylor City Hall polling place location and obtain the specific full names of the election workers from this occurrence at the Taylor City Hall on October 24, 2012. Once again, the election worker EW1 said that the words "Vote the Bible" on Ms. Hill's t-shirt "may be offensive." None of the election workers ever used the term "electioneering" as a reason for banning Ms. Hill's t-shirt.

Ms. Hill then called the Williamson County election office the same day, around 10 a.m., and she was transferred to someone named "T." Ms. Hill asked "T" if there is a dress code to vote. "T" made some comments about "logos" and "electioneering." Ms. Hill then described her t-shirt that was banned at the Taylor City Hall polling place. Ms. Hill was then transferred to Rick Barron, the Williamson County Election Administrator. Ms. Hill then described to Mr. Barron the events from that morning at the Taylor City Hall when Ms. Hill was forced to cover up the words "Vote the Bible" on her t-shirt when she attempted to vote and Mr. Barron said "that's up to the (election) judge's discretion" in regard to the decision to ban the words "Vote the Bible." Mr. Barron went on to tell Ms. Hill that "I'm sure she (the election worker) felt like it ("Vote the Bible" phrase) meant – vote Republican." Mr. Barron asked Ms. Hill where she voted. Ms. Hill told Mr. Barron that she voted at the Taylor City Hall. Ms. Hill then asked Mr. Barron to confirm that an election worker could do this. Mr. Barron responded in the affirmative, that an election worker could tell Ms. Hill to change her t-shirt with the words "Vote the Bible" in order to vote.



In light of these actions taken against Ms. Hill, the real likelihood of other voters being mistreated and with only a few days left of voting, we along with Ms. Hill request that the Williamson County Election Office proceed with the following immediate actions in response, **by no later than 5 p.m. on Thursday, November 1, 2012:**

- (1) Release a public statement that a t-shirt with words "Vote the Bible" is permissible to wear when voting in Williamson County,
- (2) Circulate a memorandum to all Williamson County election workers and/or polling places stating that a t-shirt with the words "Vote the Bible" is permissible to wear when voting in Williamson County, and
- (3) Issue a public apology to Ms. Alva Kay Hill for the embarrassment, humiliation, and intimidation she suffered as a result of her being forced to cover up the words "Vote the Bible" on her t-shirt in order to vote.

If the Williamson County Election Office chooses to refuse this request, Ms. Hill will have no choice to but proceed with filing her formal complaint with the Texas Secretary of State's office.

We anticipate and await your prompt response.

Sincerely,



Jonathan M. Saenz, Esq.

President, Texas Values

Cc: The Honorable Dan A. Gattis, County Judge, Williamson County