

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

_____	x	
)	
AMERICAN ASSOCIATION OF PEOPLE)	
WITH DISABILITIES, FEDERATION OF)	
WOMEN’S CLUBS OVERSEAS, INC., NEW)	
MEXICO PUBLIC INTEREST RESEARCH)	
GROUP EDUCATION FUND, and)	
SOUTHWEST ORGANIZING PROJECT,)	
)	
Plaintiffs,)	No. CV 08-702 JOB/WDS
)	
)	
v.)	
)	
MARY HERRERA, in her capacity as)	
Secretary of State,)	
)	
Defendant)	
)	
)	
_____	x	

**DECLARATION OF SCOTT FUQUA IN SUPPORT OF
DEFENDANT MARY HERRERA’S REPLY IN SUPPORT OF
MOTION FOR SUMMARY JUDGMENT**

I, Scott Fuqua, hereby declare;

1. I am a member of the bar of the states of New Mexico and Texas and an Assistant Attorney General for the State of New Mexico, attorney for the Defendant. I submit this Declaration in support of Defendant Mary Herrera’s Motion for Summary Judgment. I make this Declaration based on personal, firsthand knowledge and if called and sworn as a witness could and would testify competently hereto.

2. Attached hereto as Exhibit 1 is a true and correct copy of portions of the deposition of Mary Herrera, New Mexico Secretary of State, taken on March 3, 2010.

3. Attached hereto as Exhibit 2 is a true and correct copy of portions of the deposition of Don Francisco Trujillo, New Mexico Deputy Secretary of State, taken on January 12, 2010.

4. Attached hereto as Exhibit 3 is a true and correct copy of portions of the deposition of Maggie Toulouse-Oliver, Bernalillo County Clerk, taken on February 17, 2010.

5. Attached hereto as Exhibit 4 is a true and correct copy of the Affidavit of Denise Lamb, Director of the Bureau of Elections for Santa Fe County, dated August 13, 2008.

Pursuant to 28 U.S.C. § 1746, I certify under penalty of perjury that the foregoing is true and correct:

Dated: Santa Fe, NM
August 13, 2010

/s/ Scott Fuqua
Scott Fuqua

EXHIBIT 1

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF NEW MEXICO

3 AMERICAN ASSOCIATION OF PEOPLE WITH
4 DISABILITIES, FEDERATION OF AMERICAN
5 WOMEN'S CLUBS OVERSEAS, INC.,
6 NEW MEXICO PUBLIC INTEREST RESEARCH
GROUP EDUCATION FUND, and SOUTHWEST
ORGANIZING PROJECT,

7 Plaintiffs,

8 vs.

No. CIV 08-00702 JOB

9 MARY HERRERA, in her capacity as
10 Secretary of State,

11 Defendant.

12
13 DEPOSITION OF MARY HERRERA

14 March 3, 2010

15 10:00 a.m.

16 Offices of Rodey, Dickason,

Sloan, Akin & Robb

17 315 Paseo de Peralta

Santa Fe, New Mexico 87501

18 PURSUANT TO THE FEDERAL RULES
19 OF CIVIL PROCEDURE, this deposition was

20 TAKEN BY: CHARLES E. BORDEN
ATTORNEY FOR PLAINTIFFS

21
22 **CERTIFIED COPY**

23 REPORTED

24 BY: ELLEN ALLANIC, CCR 100, CSR
Cumbre Court Reporting, Inc.
2019 Galisteo Street - Suite A-1
Santa Fe, New Mexico 87505
25 (505) 984-2244

CUMBRE COURT REPORTING

1 Q. What if they were not in the State
2 of New Mexico?
3 A. Then we would work something out,
4 through the phone or through -- you know,
5 try to set up something on the internet, or
6 some way.
7 Q. Does the Secretary of State's
8 Office presently have any procedures in
9 place to provide for remote training?
10 A. No, we don't.
11 Q. Are there plans to create
12 procedures to provide for remote training?
13 A. If I received requests, yes, I
14 would do it. I would have no problem.
15 Q. Let's move on to another aspect of
16 the challenged law.
17 A. Okay.
18 Q. Can you take a look at Exhibit 1
19 and Exhibit 2 and look at the sections
20 marked the 48-hour requirement.
21 A. Yes.
22 Q. Can you read the sections and then
23 let me know when you are ready to proceed.
24 A. One by one or all of them?
25 Q. All the ones that are marked for

1 next weekend.
2 And, of course, if they register
3 on a Friday, they have -- they have more
4 than 48 hours, because you don't turn them
5 in on a Sunday. They can turn them in and
6 keep their forms.
7 It's the date that the person
8 registers to vote. They have time to bring
9 that in to the county clerk. They don't
10 have to -- not the time they pick up the
11 form.
12 Q. Just so I'm clear, the 48-hour
13 clock begins to run from the moment an
14 individual completes a voter registration
15 form?
16 A. Correct.
17 Q. And once an individual has
18 completed a voter registration form, the
19 third-party voter registration agent who is
20 registering that individual has 48 hours to
21 turn that form in to a county clerk's
22 office or the Secretary of State's Office?
23 A. Correct.
24 Q. Does the third-party voter
25 registration agent have to hand-deliver

1 the 48-hour requirement, just those
2 provisions.
3 A. (Witness complies.) Okay.
4 Q. What is your understanding of the
5 48-hour requirement?
6 A. The day that the person registers,
7 they have 48 hours to turn that form in to
8 their county clerk.
9 Q. The day an individual registers to
10 vote they have to turn the form in within
11 48 hours?
12 A. Right.
13 Q. Just so I understand, are you
14 saying the obligation rests with the --
15 A. The third-party registrant turns
16 the form in.
17 Q. So the third-party voter
18 registration agent must turn the form in
19 within 48 hours of receiving the form?
20 A. No, not receiving it. The date
21 that the individual registers to vote.
22 They can pick up 50 forms and they
23 may register three the first day and then
24 they have 48 hours to turn in the three.
25 And then they can go out and register the

1 those forms to the County Clerk's Office or
2 the Secretary of State's Office?
3 A. No. We get some in the mail.
4 Because they're already recorded that they
5 picked up those forms for the number. We
6 receive some in the mail and then we send
7 them out to the clerk's office.
8 I'm telling you what we do, on our
9 end.
10 Q. Your understanding of what the law
11 requires is that if a person -- the
12 third-party voter registration agent places
13 a completed form in the mail within 48
14 hours, that agent has complied with the
15 48-hour requirement?
16 A. Yes.
17 Q. Does it have to be postmarked
18 within 48 hours or does it just have to be
19 placed in the mail within 48 hours?
20 A. If it's postmarked within the 48
21 hours and it comes a day later or two days,
22 they've complied.
23 Q. What if it's postmarked after the
24 48 hours but it was placed in the mail
25 before the 48 hours?

1 recommendations, make sure that we didn't
2 leave anything out.

3 Q. But nobody else in the Secretary
4 of State's Office was a principal author of
5 the manual, played a significant role in
6 the drafting of the --

7 A. Not that I remember, no. Because,
8 ultimately, Larry Dominguez and myself
9 worked on it.

10 Q. When was this manual prepared?

11 A. Let me see. A year after I was in
12 office. I went in -- about 2007.

13 Q. And has it been updated since
14 then?

15 A. No. But it will because of the
16 new form that we just implemented. We are
17 going to get them ready for the new school.

18 Q. What is the new form?

19 A. Well, we tried to cut back on
20 costs and we created a new form that the
21 clerks can use. We are going to still use
22 the big yellow form with the receipts to
23 distribute to third-party agents -- maybe
24 it wouldn't. Never mind.

25 Because we implemented a new form

1 Q. And can you look at the section
2 that is entitled, Duties of a Third-party
3 Agent, and look at paragraph 2.

4 Can you read that paragraph to
5 yourself and then let me know when you are
6 ready to proceed.

7 A. (Witness complies.) Yes.

8 Q. What is your understanding of what
9 this paragraph requires?

10 A. Well, you know, the third-party --
11 the third-party agent picks up their forms,
12 they are out registering, and if they feel
13 somebody is filling it out bogus, you know,
14 not putting the right name or making
15 something up, they have the right to ask
16 for an ID from the person that wants to
17 register to vote. They give a wrong name
18 and then: Oh, no, no, no. My name is...

19 If you feel that they are not
20 filling out the form -- because you turn
21 them in, you don't want to be questioned --
22 you know, you got to give them a little bit
23 of leeway as well.

24 Q. So is this paragraph saying that a
25 third-party voter registration agent is

1 that the clerks can use in their office
2 that's not so costly, trying to cut back on
3 the costs because we already ran out of
4 money for voter registration forms this
5 year. And so we had to make a little
6 adjustment there.

7 Q. What is the form that the
8 county --

9 A. It is very similar. It's just the
10 multiple colors are so costly with the
11 receipts, so now the clerks -- the white
12 form will look exactly the same. It's just
13 not making all the multiple colors for the
14 receipts.

15 When they go in, it's just going
16 to be the form, because we don't need the
17 receipt. It is a cutback on costs.

18 Q. But it is the part of the form
19 that the county clerks use to log the
20 registration forms?

21 A. Right, right.

22 Q. Can you turn to page 8 of the
23 manual. It is also at the bottom marked
24 SOS-24.

25 A. Yes.

1 required to review and assess the validity
2 of a voter registration application they
3 receive?

4 A. No, they are not responsible. It
5 is just if they feel that something is odd
6 or not right, they can ask for it, like
7 protection for themselves. They don't have
8 to, though.

9 Q. Can you turn to the next page,
10 page 9, SOS-25.

11 A. Yes.

12 Q. If you look at the subsection
13 entitled, Providing Assistance, How Much is
14 Enough? It is in the middle of the page.

15 Could you read that sentence and
16 then when you are ready to proceed, let me
17 know.

18 A. (Witness complies.) Okay.

19 Q. Does this sentence indicate that
20 third-party voter registration agents are
21 obliged to provide bilingual assistance in
22 registering people to vote?

23 A. No.

24 Q. What is the meaning of this
25 passage?

EXHIBIT 2

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEW MEXICO

3 AMERICAN ASSOCIATION OF PEOPLE
4 WITH DISABILITIES, FEDERATION OF
5 WOMEN'S CLUBS OVERSEAS, INC., NEW
6 MEXICO PUBLIC INTEREST RESEARCH
7 GROUP EDUCATION FUND, and
8 SOUTHWEST ORGANIZING PROJECT

9 Plaintiffs,

10 vs.

No. CIV 08-00702 JOB

11 MARY HERRERA, in her capacity as
12 Secretary of State,

13 Defendant.

14 CERTIFIED COPY

15 DEPOSITION OF DON FRANCISCO TRUJILLO II

16 January 12, 2010

17 10:22 a.m.

18 Rodey Law Firm

19 315 Paseo de Peralta

20 Santa Fe, New Mexico 87501

21 PURSUANT TO THE FEDERAL RULES OF CIVIL PROCEDURE,
22 this Deposition was:

23 TAKEN BY: CHARLES E. BORDEN
24 ATTORNEY FOR THE PLAINTIFFS

25 REPORTED BY: DEBORAH O'BINE
NEW MEXICO CCR #63
CUMBRE COURT REPORTING, INC.
2019 Galisteo, Suite A-1
Santa Fe, New Mexico 87505

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1 responsibility is for them to provide them with the
2 manual. That's the purpose of the manual, not to sit in
3 their office.
4 Q. What information do you provide in these
5 trainings with respect to each of the requirements we've
6 just been discussing, the 48-hour limit, the 50-form
7 limit? What sort of information is provided on those
8 issues in these trainings?
9 A. We just basically outline the basics, and if
10 they have questions, then it's open for discussion.
11 Q. Do you provide information on penalties for
12 failing to comply with these requirements in these
13 trainings?
14 A. I think about the only statement that has been
15 made, to the best of my knowledge, was that it's -- I
16 believe it's a fourth-degree felony if it's not complied
17 with. I believe that's about the only statement that's
18 been made.
19 Q. It's a fourth-degree felony if any of the voter
20 registration requirements are not complied with?
21 A. If the 48-hour rule is not complied with. I
22 believe that's what's been --
23 Q. Is that true even if it's inadvertently not
24 complied with?
25 A. No. We've had questions where they ask, as you

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1 asked earlier. The example is what if I'm a voter, and I
2 decide I'm not going to give it to you. What are you
3 going to do, beat me up and take it away from me?
4 Q. Let me just rephrase. What if someone
5 inadvertently didn't comply with the 48-hour requirement?
6 In other words, they got the forms. They were going to
7 bring them in one morning. And then they got busy,
8 forgot, and brought them in the next day, but it was now
9 60 hours rather than 48. Is that a fourth-degree felony?
10 A. How we would handle that at the Secretary of
11 State's Office? No. We would simply, you know, readvise
12 them of what the rules are and that there could be a
13 potential for that in the future.
14 Our purpose at the Secretary of State's Office
15 in anything we handle is never to nail anybody to the
16 wall. Our purpose is to try and educate them. If they're
17 doing things incorrectly, to reeducate them to try to get
18 them to do things right.
19 Now, if there's a constant pattern, then yeah,
20 something is going to give, and we'll refer to the
21 Attorney General or to the District Attorney, if we need
22 to. But as a rule, we don't right away report everybody.
23 We try to work with people so they try to fully understand
24 why there's certain rules and why they should comply with
25 them.

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1 Q. Has the Secretary of State's Office or the
2 County Clerk's Office ever provided training to someone
3 who was not present at -- I'm sorry. Let me rephrase.
4 Have you ever provided training to people who were remote;
5 i.e., that they were not actually present at the training
6 itself but were in another country or not physically
7 there?
8 A. I can't speak for the County Clerks, but I can
9 say that that's never happened at the Secretary of State's
10 Office. You mean like Web X training or over-the-phone
11 instruction or something? Never. If they're not
12 physically present, then no.
13 Q. Would the Secretary of State's Office provide --
14 A. No.
15 Q. Why not?
16 A. We have no idea that we're giving the training
17 to the person -- I mean, there's no guarantee. What if
18 I'm talking to you on the phone, and he's the one that
19 mails me the forms, and -- there's no guarantee, no. If
20 not in person, no.
21 Q. Have you ever had a request for training that
22 was not in person?
23 A. To the best of my knowledge, no.
24 Q. And how frequently would you say trainings are
25 conducted?

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1 A. Again, when people ask. I don't even know if
2 we've done any this year, to be honest with you. I don't
3 monitor it that closely. If somebody came into the office
4 and said, "Can somebody train me," and Larry went into the
5 conference room and trained them for 15 minutes, that
6 could easily get by me. I don't go and verify the record.
7 So I don't know.
8 They were frequent prior to the 2008 Primary
9 Election. That's when we had the most training. And
10 again for our office, Daniel Miera handled all of that,
11 basically.
12 Q. Did you ever turn down a request for a training
13 from anyone?
14 A. To the best of my knowledge, no. In fact, as I
15 stated before, when the County Clerk in Santa Fe, when her
16 office turned down people, we bent over backwards and did
17 everything we could to train them. And there were several
18 groups, several.
19 Q. And other than the Santa Fe County Clerk, are
20 you aware of any County Clerks that denied requests for
21 trainings?
22 A. Again, no, as I stated.
23 Q. On a somewhat related question, what's your
24 understanding for when the law's requirements apply to
25 somebody who wishes to assist the voter in filling out a

EXHIBIT 3

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

No. CIV 08-00702 JOB

AMERICAN ASSOCIATION OF PEOPLE)
WITH DISABILITIES, FEDERATION OF)
AMERICAN WOMEN'S CLUBS OVERSEAS,)
INC., NEW MEXICO PUBLIC INTEREST)
RESEARCH GROUP EDUCATION FUND, and)
SOUTHWEST ORGANIZING PROJECT,)

Plaintiffs,)

vs.)

MARY HERRERA, in her capacity as)
Secretary of State,)

Defendant.)

CERTIFIED COPY

DEPOSITION OF MAGGIE TOULOUSE OLIVER

February 17, 2010
9:02 a.m.

201 3rd Street NW, Suite 2200
Albuquerque, NM 87102

PURSUANT TO THE FEDERAL RULES OF CIVIL PROCEDURE,
this deposition was:

TAKEN BY: ADAM C. GOLDSTEIN, ESQ.
ATTORNEY FOR THE PLAINTIFFS

REPORTED BY: KATHLEEN H. O'DONNELL, RPR
NEW MEXICO CCR #75
CUMBRE COURT REPORTING
2019 Galisteo, Suite A-1
Santa Fe, NM 87505

CUMBRE COURT REPORTING

1 agent?
2 A. No, probably not.
3 Q. What is "probably not"?
4 A. When we're processing voter registration
5 forms, as I indicated previously, you mentioned the
6 date of completion being on the form, because that is
7 not something that we would deal with typically in
8 the course of our process, it's not something that
9 our staff would really necessarily take note of. And
10 unless it was brought to our attention or something
11 else caused us to become aware of the fact that, you
12 know, this isn't exactly 48 hours from the date
13 that's on here, it's -- we wouldn't necessarily be
14 aware, just because we're dealing with other aspects
15 of the form. We're entering it. We're making sure
16 it's accurate, et cetera. We're not necessarily
17 focused on the date it was completed. We're focused
18 on when it came into our office and completing it
19 timely from that point on.
20 Q. What if the completion date, box eight on
21 Exhibit 1, were January 1st, 2009, and your office
22 doesn't receive it until February 1st, 2009, would
23 your office notice that when you're processing?
24 A. Maybe, but not necessarily.
25 Q. Are you aware of any situation where the

1 the first time that I'm aware of, we actually did
2 finally refer a situation for -- pertaining to the
3 date to the Secretary of State's office following the
4 administrative procedure that we were notified about
5 last spring.
6 And the reason for that was -- it's not
7 because my staff flagged it. It's because we had
8 voters who were interested in attending their
9 Democratic order precinct meetings that were told
10 they couldn't participate because weren't on the
11 list. They contacted our office to find out what was
12 the deal with the list.
13 And we came to find out that they had
14 registered with a third-party agent in November of
15 2009, and the forms were not turned in to our office
16 until January of 2010. And because that information
17 had been brought to our attention by those voters who
18 were potentially going to be disenfranchised from
19 that process, we did make the Secretary of State
20 aware of that. And this was just within the last
21 couple of weeks.
22 Q. Are you aware whether the Secretary of State
23 has followed up with this?
24 A. I have no idea.
25 Q. How did you notify the Secretary of State?

1 Bernalillo County Clerk's office has noticed a delay
2 like that?
3 MR. LANDERS: Object to the form.
4 A. Not that's been brought to my attention.
5 Q. BY MR. GOLDSTEIN: And continuing with this
6 hypothetical of the January 1st, 2009, completion
7 date, if it were still submitted well in advance of
8 the registration deadline, is there a reason the
9 Bernalillo County Clerk's office would be concerned
10 with that today's date versus the date it was turned
11 in to your office?
12 A. I think -- would we be concerned? Certainly
13 if it's something that my staff took note of, they
14 would probably be concerned. But at that point, the
15 primary concern would be to just process the
16 application as quickly as possible.
17 Q. Have you ever referred a third-party agent
18 to any law enforcement because the date the form was
19 turned in to your office was beyond 48 hours past the
20 today's date on Exhibit 1?
21 A. I had not done that -- well, let me say I
22 have not referred it to any law enforcement agency,
23 no.
24 Q. Have you flagged it to any organization?
25 A. Recently, extremely recently, I think for

1 A. We sent them a letter.
2 Q. Was that letter produced?
3 A. This has been since the subpoena. This is
4 literally like the week before last.
5 Q. Okay. Do you know where the 48-hour
6 requirement came from?
7 A. In my vague recollection of the debate that
8 was going on at the time within the legislature that
9 this law was passed, my recollection is that it was
10 just in order to ensure the timely return of the
11 forms to the clerks' offices so they could be
12 processed so there weren't issues such as what I just
13 described where people would potentially be
14 disenfranchised. But also, I believe, with the
15 exception -- I'm sorry.
16 With the purpose of not being overly
17 restrictive on the third-party agents, i.e., within
18 the same business day, because, for example, if you
19 have a third-party agent working out in some
20 far-flung part of the state and it's quite a drive to
21 get to the county clerk's office, that they -- it
22 wouldn't be overly restrictive to prevent them from
23 being able to do that. So that's my understanding of
24 where that 48-hour requirement came from.
25 Q. Aside from this instance where you notified

EXHIBIT 4

AFFIDAVIT OF DENISE LAMB

Denise Lamb, being duly sworn, hereby states as follows:

1. My name is Denise Lamb. I have personal knowledge of the facts set forth below and am otherwise competent to make this affidavit.

2. I am the Chief Deputy Clerk for the Bureau of Elections in the Santa Fe County Clerk's Office. I have held that position since January 2005. Before taking this job, I served as the Director of the Bureau of Elections at the New Mexico Secretary of State's Office from 1994 to December 2004. My duties now include processing voter registration forms.

Problems with Third Party Voter Registration Agents

3. I have had personal experience with third party voter registration efforts in working for the Secretary of State and for Santa Fe County. I have encountered such efforts both before and after the passage of NMSA 1978, § 1-4-49, the third party voter registration law. Based on that experience, I believe the law is an effort to ensure that the actions of third party voter registration groups do not disenfranchise of the people such groups profess to empower.

4. The efforts of third party voter registration groups have, in the past, sometimes been accompanied by serious problems. In 1999, for example, members of the Libertarian Party of New Mexico engaged in conduct that, if undetected, would have resulted in widespread disenfranchisement of already-registered voters. In their effort to qualify as a major party under New Mexico's election law, the Libertarian Party launched a statewide voter registration effort aimed at increasing the number of registered Libertarians in New Mexico.

5. I was informed that the Libertarian Party did not, however, describe their effort as a voter registration drive. Instead, members of the party approached individuals in public asking them to sign a petition aimed at establishing the Libertarian Party as a major party. The so-called

petition was, in fact, a voter registration form. Libertarian Party members told the people filling out the forms to leave blank the "Party Affiliation" line of the registration form and later wrote in "Libertarian." As a result of this conduct, approximately 800 already registered voters were unregistered from their party of choice and re-registered as members of the Libertarian Party. Fortunately, many County Clerks recognized the names of the re-registered voters and were able to reach nearly all of the people affected. Nonetheless, I received calls from voters who were unable to vote in their party's primary as a result of this fraud. I remember one call in particular from an elderly woman who did not understand why she had been turned away from the polls when she tried to vote in her party's primary.

6. Following the 2000 election, I received a call from the Democratic Party of New Mexico. According to the caller, in cleaning out their offices, somebody located approximately 200 completed voter registration forms in a desk drawer. Those forms were never submitted to the appropriate election official, and as a result at least 200 New Mexico citizens who believed they were registered to vote were unable to do so in what turned out to be the closest presidential election in New Mexico's history.

7. Two separate incidents occurred in 2004 that heavily underscore the need for a law like Section 1-4-49. First, a group called Rock the Vote attempted to register a large number of young voters for the presidential election. The group, however, failed to turn in several completed voter registration cards. As a result, approximately 60 or 70 young, enthusiastic voters were turned away at the polls after believing they had registered to vote.

8. Also in the 2004 election cycle, a group called the Association of Community Organizations for Reform Now ("ACORN") engaged in conduct that resulted in testimony from an ACORN member in a lawsuit between the New Mexico Republican Party and the New

Mexico Secretary of State. The New Mexico Republican Party alleged, based on media accounts, that an ACORN member had registered a 14-year old to vote in Bernalillo County. I received several calls in 2004 from voters who had been approached in public by a representative of a third party voter registration agent, had completed a voter registration form, but were denied the opportunity to vote because their names did not appear on the voter rolls. I received such calls every year I worked for the Secretary of State and have received them every year I have worked for the Santa Fe County Clerk.

The 48-Hour Time Limit

9. The election officials who process voter registration forms need adequate time to do so in order to ensure that everyone who has attempted to register to vote before the deadline for registration in advance of an upcoming election (called “book closing”) is, in fact, registered. If election officials do not receive voter registration forms with sufficient time before book closing to process those forms, many potential voters will not be registered. In my experience, not only is a 48-hour deadline for the return of a completed voter registration form important to ensure that voters are actually registered, but it is also feasible for third party voter registration groups to comply with that deadline.

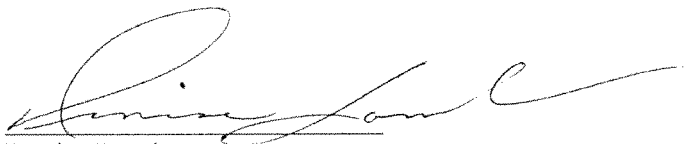
The Fifty Form Limit

10. It has been my experience that County Clerks generally, and the Santa Fe County Clerk in particular, are willing to accommodate third party registration groups that make a reasonable and legitimate request for more than fifty voter registration forms at one time. To my knowledge, the Santa Fe County Clerk’s Office has not refused a single request for additional voter registration forms.

Training Requirements

11. I have personally conducted training sessions for the certification of third party voter registration agents. The training sessions typically take between 15 and 20 minutes. The trainees receive a pamphlet they can use as a resource in their voter registration efforts and a list of phone numbers for County officials the registration agents can contact if they have questions or encounter unforeseen circumstances. The Santa Fe County Clerk's Office will provide training to any group that requests it at a mutually agreeable time and location, even if it results in a training session that occurs after business hours or on the weekend.

The foregoing is true and correct to the best of my knowledge.



Denise Lamb

Sworn to me this 13th day of August, 2008 in Santa Fe County, New Mexico.



Notary Public

Expire : 01/13/09