

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS**

JOLT INITIATIVE, INC.,

Plaintiff,

v.

KEN PAXTON, in his individual and official
capacity as Attorney General of Texas,

Defendant.

Case No.: 1:25-cv-001808

PLAINTIFF'S MOTION FOR A PRELIMINARY INJUNCTION

Plaintiff Jolt Initiative, Inc. (Jolt), by and through its undersigned counsel, hereby moves the Court pursuant to Rule 65 of the Federal Rules of Civil Procedure for a preliminary injunction barring Defendant Attorney General Ken Paxton from seeking to revoke Jolt's corporate charter based on Jolt's constitutionally protected activities. Specifically, Jolt asks the Court to enjoin Defendant from proceeding with a retaliatory quo warranto action against Jolt in Texas state court.

INTRODUCTION

This case is about Defendant's campaign of intimidation and reprisal against Jolt based on its constitutionally protected activities. In August 2024, following the circulation on social media of conspiracy theories about noncitizen voting, Defendant launched an investigation into nonprofits like Jolt that register Texans to vote and served Jolt with a Request to Examine (RTE), demanding confidential information about Jolt's constitutionally protected voter registration activities. Jolt then filed a federal lawsuit challenging the RTE and asserting Jolt's constitutional

rights. *See Jolt Initiative, Inc. v. Paxton (Jolt I)*, No. 1:24-cv-1089 (W.D. Tex. filed Sept. 13, 2024). Eventually, Defendant agreed to withdraw the RTE and promised not to reissue a similar investigative demand, and the parties jointly stipulated to dismissal of *Jolt I*. But on the same day the federal case was closed—and without any prior notice to Jolt—Defendant filed a quo warranto action against Jolt in Texas state court, seeking to revoke Jolt’s corporate charter. Defendant’s quo warranto petition simply recycles the same false allegations that Jolt has previously refuted in federal court and has no basis in law or fact.

Defendant’s filing of the quo warranto action in retaliation for Jolt’s constitutionally protected activities—including both Jolt’s expressive voter-registration drives and its filing of the prior lawsuit to petition for the redress of grievances—violates Jolt’s First Amendment rights. It also violates § 11(b) of the Voting Rights Act of 1964 because it attempts to intimidate Jolt for its voter-registration activity. This Court should enjoin Defendant from seeking to revoke Jolt’s charter based on Jolt’s constitutionally protected activities.

BACKGROUND

Jolt Initiative, Inc., is a 501(c)(3) nonprofit organization, incorporated in Texas, that seeks to “increase the civic participation of Latinos in Texas to build a stronger democracy.” Bastard Decl. ¶ 6. Jolt “conduct[s] voter registration drives,” *id.* ¶ 11, “ensure[s] that community members conduct nonpartisan voter registration in accordance with state law,” *id.* ¶ 10, and “encourages Latinos in Texas to vote through public education campaigns, leadership programming, and other measures,” *id.* ¶ 18. Jolt also “speak[s] out on issues that matter to Latinos in Texas.” *Id.* ¶ 21.

Many Jolt employees and volunteers are Volunteer Deputy Registrars (VDRs) who are authorized under state law to handle voter registration forms. *See id.* ¶ 12. At Jolt registration

drives, VDRs “explain the eligibility requirements” to those interested in registering to vote, “answer any questions, and walk them through the process of filling out a voter registration form.” *Id.* ¶ 16. VDRs then deposit completed registration forms with the county registrar. *Id.*

On August 20, 2024, a far-right activist posted a video on X in which he purported to confront a Jolt VDR outside of a Texas Department of Public Safety office. *See* Ex. 1.¹ The post said, “we have Marxist non profit organizations like @JoltAction infiltrating Texas @TxDPS locations in San Antonio,” and it tagged Defendant’s X account (@KenPaxtonTx). *Id.* The post came two days after a different social media post—by a television personality with a history of promoting conspiracy theories—which falsely claimed that people who were ineligible to vote were being registered at locations in and around North Texas. *See* Ex. 2;² Berenice Garcia, *A Fox News Host’s Debunked Election Conspiracy Appears to Have Prompted a State Investigation*, Tex. Trib. (Aug. 26, 2024), <https://perma.cc/9PM6-H9YS> [hereinafter *Debunked Election Conspiracy*].

The day after he was tagged by the far-right activist, Defendant announced “an investigation into reports that organizations operating in Texas may be unlawfully registering noncitizens to vote in violation of state and federal law.” Press Release, Tex. Office of Att’y Gen., *Attorney General Ken Paxton Launches Investigation into Reports That Organizations May Be Illegally Registering Noncitizens to Vote* (Aug. 21, 2024), <https://perma.cc/EF4H-E6PP>. Defendant specifically “call[ed] into question the motives of the nonprofit groups” that register voters outside of DPS offices. *See id.* Jolt’s sister organization, Jolt Action, Inc., issued a statement

¹ hernando arce (@hernandoarce), X (Aug. 20, 2024, 13:53 ET), <https://x.com/hernandoarce/status/1825954284858417608>.

² Maria Bartiromo (@MariaBartiromo), X (Aug. 18, 2024, 9:56 ET), <https://x.com/MariaBartiromo/status/1825169849363972404>.

days later criticizing Defendant for “suppress[ing] voter registration” and “attack[ing] Texans once again.” Bastard Decl., Ex. A.

The RTE soon followed. It demanded four categories of documents: (1) certificates of appointment for Jolt’s VDRs; (2) documents that Jolt provides to its VDRs concerning voter registration; (3) documents that Jolt provides to its VDRs concerning Jolt’s role in voter registration; and (4) receipts for completed registration applications. *See* Bastard Decl., Ex. B, at 6. Because Jolt reasonably feared that turning over such sensitive information to Defendant would expose its employees and volunteers to further harassment and intimidation and jeopardize Jolt’s voter-registration work, Jolt filed a federal lawsuit challenging the RTE under the First and Fourth Amendments to the United States Constitution and under § 11(b) of the Voting Rights Act. *Jolt I*, No. 1:24-cv-1089 (W.D. Tex. filed Sept. 13, 2024). Rather than defend the legality of the RTE in federal court, Defendant withdrew the RTE and secured Jolt’s agreement to voluntarily dismiss its case by promising not to serve another RTE concerning the same subject matter. The federal court therefore closed Jolt’s case on October 23, 2025.

That same day, Defendant filed a motion for leave to file an original petition and information in the nature of quo warranto, Bastard Decl. Ex. C, along with a proposed quo warranto petition, Bastard Decl. Ex. D. (“Pet.”), in the District Court of Tarrant County, Texas. The quo warranto petition relies on the same allegations that Paxton previously invoked in support of the RTE and that Jolt refuted in the prior litigation. It presents nothing new, aside from partisan rhetoric alleging that Jolt is “divisive” and “devious,” Pet. 4, 7. “The purpose of a quo warranto proceeding is to question the right of a person or corporation, including a municipality, to exercise a public franchise or office.” *In re Dallas Cnty.*, 697 S.W.3d 142, 152 (Tex. 2024) (citation

omitted). Through such proceedings, the Texas Attorney General may seek judicial forfeiture of a corporation's charter. Tex. Const. art. IV, § 22.

In light of the existential threat to Jolt that Defendant's quo warranto proceeding poses, Jolt seeks a preliminary injunction barring Defendant from proceeding with a retaliatory quo warranto action against Jolt in Texas state court.

STANDARD OF REVIEW

A plaintiff seeking a preliminary injunction must show “(1) a substantial likelihood of success on the merits, (2) a substantial threat of irreparable injury if the injunction is not issued, (3) that the threatened injury if the injunction is denied outweighs any harm that will result if the injunction is granted, and (4) that the grant of an injunction will not disserve the public interest.” *Janvey v. Alguire*, 647 F.3d 585, 595 (5th Cir. 2011) (internal quotation marks omitted). The first factor is “arguably the most important.” *Netflix, Inc. v. Babin*, 88 F.4th 1080, 1099 (5th Cir. 2023).

ARGUMENT

I. Jolt Is Likely to Succeed on the Merits.

A. First Amendment Retaliation.

Defendant's filing of the quo warranto action unconstitutionally retaliates against Jolt for engaging in activity protected by the First Amendment. *See Colson v. Grohman*, 174 F.3d 498, 508 (5th Cir. 1999) (“[T]he First Amendment prohibits not only direct limitations on speech but also adverse government action against an individual because of her exercise of First Amendment freedoms.”). Plaintiffs bringing a retaliation claim “must show that (1) they were engaged in constitutionally protected activity, (2) the defendants' actions caused them to suffer an injury that would chill a person of ordinary firmness from continuing to engage in that activity, and (3) the defendants' adverse actions were substantially motivated against the plaintiffs' exercise of

constitutionally protected conduct.” *Keenan v. Tejeda*, 290 F.3d 252, 258 (5th Cir. 2002). Each of these elements is satisfied here.

1. Jolt Engaged in Protected Activity.

Jolt has engaged in two forms of activity protected by the First Amendment. First, its voter registration efforts constitute core political speech. Second, Jolt’s prior lawsuit challenging Defendant’s RTE implicates its right to petition the government for redress of grievances.

To start, Jolt’s voter registration activities involve classic First Amendment expression, implicating the freedom of speech and the freedom of association. Jolt is “an organization centered around uplifting the power of young Latino voters.” Bastard Decl. ¶ 6. It mobilizes community members “with the goal of forging a democracy that works for everyone.” *Id.* And it “speak[s] out on issues that matter to Latinos in Texas.” *Id.* ¶ 21. The Supreme Court has described this sort of advocacy as “core political speech.” *Susan B. Anthony List v. Driehaus*, 573 U.S. 149, 168 (2014). And because Jolt seeks to “empower[], equip[], and mobilize[] individuals to speak up” for themselves and their communities, Bastard Decl. ¶ 4, its speech also implicates the “corresponding right to associate with others in pursuit of a wide variety of political, social, economic, educational, religious, and cultural ends,” *Roberts v. U.S. Jaycees*, 468 U.S. 609, 622 (1984).

In the context of voter registration specifically, “Jolt exists to support the Latino community and to encourage our communities to get out and vote in record numbers.” Bastard Decl. ¶ 10. The Fifth Circuit has made clear that these activities are protected expression. In *Voting for America, Inc. v. Steen*, 732 F.3d 382 (5th Cir. 2013), for instance, the Fifth Circuit described several components of voter registration in Texas—including “urging citizens to register; distributing voter registration forms; helping voters to fill out their forms; and asking for

information to verify that registrations were processed successfully”—as “constitutionally protected speech.” *Id.* at 389 (internal quotation marks omitted); *see id.* at 390 (“voter registration drives involve core protected speech”).

In addition, Jolt’s filing of its prior lawsuit against Defendant is protected by the First Amendment. *See* Compl., *Jolt I*, No. 1:24-cv-1089 (W.D. Tex. filed Sept. 13, 2024). “It is by now well established that access to the courts is protected by the First Amendment right to petition for redress of grievances.” *Wilson v. Thompson*, 593 F.2d 1375, 1387 (5th Cir. 1979) (citing *NAACP v. Button*, 371 U.S. 415, 429-30 (1963); *Cal. Motor Transp. Co. v. Trucking Unlimited*, 404 U.S. 508, 510-11 (1972)). Courts have held that “a private citizen exercises a constitutionally protected First Amendment right *anytime* he or she petitions the government for redress; the petitioning clause of the First Amendment does not pick and choose its causes.” *Van Deelen v. Johnson*, 497 F.3d 1151, 1156 (10th Cir. 2007) (Gorsuch, J.); *see also Anderson v. Davila*, 125 F.3d 148, 161 (3d Cir. 1997) (noting that “[n]umerous claims” of First Amendment retaliation across several circuits “have involved fact patterns in which the government took retaliatory action in response to an individual’s filing of a lawsuit”); *Harrison v. Springdale Water & Sewer Comm’n*, 780 F.2d 1422, 1427 (8th Cir. 1986) (explaining that the “right of access to the courts” occupies a “preferred place in our hierarchy of constitutional freedoms and values” (internal quotation marks omitted)). The filing of Jolt’s prior lawsuit was thus protected by the First Amendment right to petition.

2. The Quo Warranto Action—Which Threatens Jolt’s Very Existence—Would Chill a Person of Ordinary Firmness.

Defendant’s quo warranto action would deter a person of ordinary firmness from continuing to engage in activity protected by the First Amendment. The petition seeks “forfeiture of JOLT’s rights and privileges as a registered corporation”; “dissolution of JOLT’s corporate

registration and corporate charter”; “appointment of a receiver to wind up JOLT’s corporate affairs”; and payment of attorneys’ fees and litigation costs.” Pet. 11. It also “operates as a notice of lien on all JOLT property in the State of Texas.” *Id.* at 10. The petition thus threatens Jolt’s very existence, which would deter an ordinary entity from exercising First Amendment rights.

Retaliation is actionable when it is “punitive,” *Colson*, 174 F.3d at 512 n.7. The Fifth Circuit has repeatedly held that criminal proceedings are sufficient to chill a person of ordinary firmness from exercising their First Amendment rights. *See Bailey v. Iles*, 87 F.4th 275, 289 (5th Cir. 2023) (“[T]here is no dispute as to the second element, as [the plaintiff’s] speech was chilled when he deleted his Facebook post in response to the arrest.”); *Brooks v. City of West Point*, 639 Fed. App’x 986, 989 (5th Cir. 2016) (actionable where plaintiff was arrested for cursing at police officer). In *Keenan*, the Fifth Circuit found that speech was sufficiently chilled where the plaintiff “was charged with ‘deadly conduct,’ a misdemeanor under Texas law, under suspicious circumstances” and “was forced to spend thousands of dollars to exonerate himself at trial.” *Keenan*, 290 F.3d at 259; *see also Izen v. Catalina*, 398 F.3d 363, 367 (5th Cir. 2005) (“Subjecting an attorney to criminal investigation and prosecution with the substantial motivation of dissuading him from associating with and representing clients opposing the IRS would violate the First Amendment.”). Although civil procedures govern quo warranto proceedings, they have “quasi-criminal origins.” *Paxton v. Annunciation House, Inc.*, 719 S.W.3d 555, 580 (Tex. 2025). And the severity of the injury that quo warranto proceedings inflict is akin to criminal penalties that can be imposed upon a corporate entity because revocation of a corporate charter amounts to an organizational death sentence. The penalties at issue in this case are comparable to, if not more severe than, the misdemeanor charge in *Keenan* and carry a substantial chilling effect.

Even if the quo warranto petition’s classification as a civil lawsuit distinguishes it from criminal proceedings, it is still actionable. Courts have recognized that civil litigation filed in retaliation for the exercise of First Amendment rights can deter people from continuing to engage in protected activity. *See Harrison*, 780 F.2d at 1428; *see also DeMartini v. Town of Gulf Stream*, 942 F.3d 1277 (11th Cir. 2019) (collecting cases); *cf. Linzy v. Cedar Hill Indep. Sch. Dist.*, 37 F. App’x 90 (5th Cir. 2002) (“We do not rule out the possibility that government use of [a pre-suit deposition] procedure could potentially serve as the basis for a viable First Amendment retaliation claim.”). For instance, in *Harrison*, the Eighth Circuit found viable a claim for First Amendment retaliation where the defendants filed a “frivolous condemnation counterclaim” to force the plaintiffs “to settle their lawsuit and to sell their property” and “to punish those citizens who seek justice in the courts.” *Harrison*, 780 F.2d at 1428. The quo warranto proceeding here, which is no ordinary civil lawsuit, carries even greater potential penalties. Defendant does not merely seek to enjoin Jolt from engaging in particular activity or to obtain monetary relief. Rather, he seeks to revoke Jolt’s right to exist in the State. That sort of threat necessarily chills expression.

The existential threat to Jolt posed by Defendant’s retaliatory quo warranto action is a far greater injury to First Amendment rights than the trifling harms that the Fifth Circuit has held are insufficient to constitute actionable retaliation. This is not a case in which a plaintiff alleges “only that she was the victim of criticism” or complains about “being subjected to and defending oneself from an investigation while suffering its concomitant stress.” *Reitz v. Woods*, 85 F.4th 780, 790 (5th Cir. 2023) (quoting *Colson*, 174 F.3d at 512). *But see Rutan v. Republican Party of Illinois*, 497 U.S. 62, 76 n.8 (1990) (First Amendment bars “even an act of retaliation as trivial as failing to hold a birthday party for a public employee” (internal quotation marks omitted)).

Here, after withdrawing the RTE that he previously issued and negotiating the dismissal of Jolt’s prior lawsuit—and without ever completing his investigation—Defendant jumped straight to seeking the revocation of Jolt’s legal right to exist in the state of Texas based on thoroughly debunked allegations. Defending against the quo warranto action will cost Jolt substantial time and resources, and in the meantime, Jolt’s ability to engage in its expressive voter-registration activity will be substantially impaired. That is the sort of “more tangible adverse action” that the Fifth Circuit and Supreme Court have recognized as sufficient to constitute actionable retaliation. *Colson*, 174 F.3d at 513; *see also Bantam Books, Inc. v. Sullivan*, 372 U.S. 58, 67 (1963) (holding that “the threat of invoking legal sanctions” constituted actionable First Amendment coercion); *Nat’l Rifle Ass’n of Am. v. Vullo*, 602 U.S. 175, 197 (2024) (holding that “coercive threats aimed at punishing or suppressing disfavored speech” support a First Amendment retaliation claim).

3. The Quo Warranto Action Was Motivated by Jolt’s Protected Activity.

Finally, Defendant’s quo warranto action was motivated by Jolt’s protected activities—the organization of Latinos, the encouragement of voter registration, and the filing of the prior federal lawsuit challenging the RTE. To succeed on a First Amendment retaliation claim, “a plaintiff must establish a ‘causal connection’ between the government defendant’s ‘retaliatory animus’ and the plaintiff’s ‘subsequent injury.’” *Nieves v. Bartlett*, 587 U.S. 391, 398 (2019) (quoting *Hartman v. Moore*, 547 U.S. 250, 259 (2006)). Specifically, the retaliatory motive “must be a ‘but-for’ cause, meaning that the adverse action against the plaintiff would not have been taken absent the retaliatory motive.” *Id.* at 399. In “ordinary” retaliation cases, *see Hartman*, 547 U.S. at 259, the plaintiff first must show that its constitutionally protected conduct was a “substantial factor” for the adverse action, and the burden then shifts to the defendant to show “by a preponderance of the

evidence that it would have reached the same decision . . . even in the absence of the protected conduct,” *Mt. Healthy City Sch. Dist. Bd. of Educ. v. Doyle*, 429 U.S. 274, 287 (1977).

In this case, “establishing the causal connection between [Defendant’s] animus and [Jolt’s] injury is straightforward.” *Nieves*, 587 U.S. at 399. Defendant’s quo warranto action is retaliatory on its face. Most obviously, the petition includes a section explicitly stating that Defendant filed the quo warranto petition because of Jolt’s prior federal lawsuit, under a heading stating that “the State attempted further investigation and JOLT sued to prevent such efforts.” Pet. 7 (capitalization altered). Within that section, after noting that Defendant served an RTE on Jolt, the petition says that, “rather than producing any documents or cooperating with the State’s investigation in any respect, JOLT commenced a federal lawsuit to stall the investigation through the 2024 election.” *Id.* As a result of Jolt’s filing of that prior lawsuit, the petition says, “the State now commences this lawsuit to hold JOLT accountable for its underlying systematic and unlawful conduct and to revoke JOLT’s right to transact business in Texas.” *Id.* The Attorney General then concludes that section of the petition, which is addressed to Jolt’s prior filing of the federal lawsuit, by stating that “[t]he termination of JOLT’s corporation is necessary to uphold public confidence and protect the legitimacy of the legal voting process.” *Id.* That is direct evidence that Defendant filed the quo warranto petition with retaliatory animus.

The quo warranto petition also indicates that Defendant was motivated by animus toward Jolt’s expressive activities, including its voter registration efforts. The petition faults Jolt for “divisive rhetoric,” alleging that Jolt “continually criticizes and demonizes the election of Republican and Conservative politicians, such as President Donald J. Trump.” *Id.* at 3; *see also id.* at 1 (accusing Jolt of “resentment for Republican and Conservative political ideology”); *id.* at 9

(alleging, without citation, that “JOLT’s partisan misconduct attempts to circumvent the opportunity for Republican and Conservative political candidates to get elected in the State”); Press Release, Tex. Office of Att’y Gen., *Attorney General Ken Paxton Sues Radical Activist Organization for Unlawfully Registering Illegals to Vote in Texas* (Nov. 10, 2025), <https://tinyurl.com/ye2tv7mk> (calling Jolt a “radical, partisan organization”). These conclusory accusations, unsupported by any evidence, have nothing to do with any alleged wrongdoing by Jolt. The only logical inference is that Defendant included these partisan smears in the quo warranto petition to broadcast his retaliatory animus toward Jolt. In addition, the petition repeatedly refers to Jolt voter-registration activity as though registering young Latinos to vote were somehow inherently wrongful. *See, e.g., id.* at 5 (stating that Jolt “does not dispute that it engages” in voter registration and “acknowledges that it regularly organizes voter registration drives in front of Texas DMV buildings and it engages in these same voter registration drives throughout the state”). That too shows retaliatory animus toward Jolt’s protected activities.

More broadly, as Jolt documented in its prior suit, the overall course of Defendant’s so-called investigation into voting irregularities demonstrates his hostility toward constitutionally protected voter registration activity—particularly voter registration focused upon Latino voters. It appears that Defendant’s investigation was sparked not by any evidence, but rather by a series of partisan posts on social media. First, on August 18, 2024, a television personality with a history of promoting conspiracy theories posted on X that people who were ineligible to vote were being registered at locations in and around Fort Worth. *See Ex. 2; Debunked Election Conspiracy, supra.* Two days after that post, a self-described “citizen journalist” and “Alpha MAGA Male” posted a video on X in which he purported to confront a Jolt VDR outside of a Texas Department of Public

Safety office. *See* Ex. 1. The post said, “we have Marxist non profit organizations like @JoltAction infiltrating Texas @TxDPS locations in San Antonio,” and it tagged @KenPaxtonTx. *Id.* Defendant announced his investigation the next day. *See* Press Release, Tex. Office of Att’y Gen., *Attorney General Ken Paxton Launches Investigation into Reports That Organizations May Be Illegally Registering Noncitizens to Vote* (Aug. 21, 2024), <https://perma.cc/EF4H-E6PP>. Two days later, Jolt’s sister organization—Jolt Action, Inc.—issued a statement criticizing Defendant for “suppress[ing] voter registration” and “attack[ing] Texans.” Bastard Decl., Ex. A. The next week, Jolt received the RTE. That sequence of events strongly suggests that Defendant’s investigation of Jolt was motivated by political disagreement with Jolt’s constitutionally protected voter registration activity. The filing of the quo warranto action is only the latest reprisal in this series of retaliatory actions by Defendant.

Because Jolt’s protected activity was a but-for cause of the quo warranto proceeding, Jolt has satisfied the causation element of First Amendment retaliation. In certain specific “types of retaliation cases,” the Supreme Court has imposed an additional requirement that the plaintiff “plead and prove the absence of probable cause.” *Nieves*, 587 U.S. at 399-402; *see also Hartman*, 547 U.S. at 263. But the rationale for that requirement has no basis in the context of a civil proceeding like this one. In *Hartman*, the Supreme Court imposed a no-probable-cause requirement for claims of retaliatory prosecution where the defendant is a law enforcement officer and not the prosecutor who brought the charge. *Id.* at 261-63. Because of the additional causal attenuation in that context, proving the absence of probable cause was necessary to “to bridge the gap between the nonprosecuting government agent’s motive and the prosecutor’s action.” *Id.* at 263. But here, Defendant is both the person with retaliatory animus and the person who filed the

quo warranto action, so there is no attenuation in the causal chain. In *Nieves*, involving a claim of retaliatory arrest, the Supreme Court applied a no-probable-cause requirement because officers “frequently must make split-second judgments when deciding whether to arrest,” and because “the content and manner of a suspect’s speech may convey vital information” about whether an arrest is necessary, such as whether the suspect intends to cooperate or poses an ongoing threat to the officer’s safety. 587 U.S. at 401-02 (internal quotation marks and citations omitted). Here, Defendant waited more than a year after initiating his investigation to file the quo warranto action, so it was not a split-second decision requiring Defendant to make in-the-moment judgments about threats to his safety. Jolt should not need to prove a lack of probable cause in order to show causation.

In any event, Defendant plainly lacks probable cause for the quo warranto petition. If the no-probable-cause requirement applies in this case, it should be tailored to the standards applicable to quo warranto petitions in Texas. The Supreme Court of Texas has recently held that, to succeed on a motion for leave to file a quo warranto petition, Defendant must show “probable ground for the proceeding.” *Annunciation House*, 719 S.W.3d at 580. Even under that lenient standard, the petition falls far short. It is based on the same baseless allegations that Defendant invoked in the prior federal lawsuit in support of his RTE. *See* Pet. 3-7; Dkt. 19, at 2-4, *Jolt I*. But those allegations have been fully discredited, based on both public reporting, *see Debunked Election Conspiracy*, *supra*, and Jolt’s evidence in the prior federal lawsuit. Defendant thus knew at the time he filed the quo warranto petition that those allegations were false. Yet the quo warranto petition is completely devoid of any new accusations besides the ones that Jolt already disproved in the prior

case. That falls far short of probable cause.³

It is striking how weak Defendant’s justifications are for the quo warranto petition. The sum total of his justification for seeking to revoke Jolt’s corporate charter, aside from hollow rhetoric about Jolt being “divisive” and “devious,” Pet. 4, 7, is: (1) an X post from Maria Bartiromo, Ex. 2; (2) a video taken by a self-described “Alpha MAGA Male,” Ex. 1; and (3) a misleading incident report from an officer who appears to be unfamiliar with Texas election law, Pet. Ex. A. In addition to being sparse, none of these “allegations” provide any reason to suspect that Jolt or its VDRs have done anything wrong.

Beginning with the Bartiromo post, which alleged unlawful voter registration by unidentified organizations at DPS offices in North Texas, the substance of the post was immediately debunked by the Parker County Republican chair and election administrator. *See Debunked Election Conspiracy, supra*. The quo warranto petition makes no attempt to substantiate the post. Instead, the petition states only that “there is no need” to register voters outside DMVs because people may register to vote inside DMVs. Pet. 5. But it is not a crime to register voters in a place that Defendant believes is suboptimal. And in any event, Jolt has explained why registering voters outside DMVs is in fact an effective strategy. *See Bastard Decl.* ¶ 14.

Moving to the video, Defendant quotes a Jolt VDR—whom Jolt has now identified as its former employee A.R., *see* A.R. Decl.—saying that a noncitizen could theoretically fill out a voter

³ The quo warranto action also is facially defective because the petition alleges no facts establishing that the District Court of Tarrant County is a proper venue. *Annunciation House*, 719 S.W.3d at 581 (holding that courts should deny a motion for leave to file quo warranto petition where “the face of the filing shows a violation of an unambiguous venue requirement”); Mot. Transfer Venue, *Texas v. Jolt Initiative, Inc.*, No. 352-371401-25 (D. Ct. Tarrant County, Texas, filed Nov. 10, 2025).

registration application because VDRs do not ask for proof of citizenship. Pet. 6. This is correct but irrelevant. It is of course true that it “contravenes State law” for a noncitizen to register to vote, *id.*, but it is also true that Texas law *prohibits* VDRs from verifying the certifications that applicants provide, Tex. Elec. Code § 13.039; *Volunteer Deputy Registrars*, Tex. Sec. of State, <https://perma.cc/38F6-CED5>; *see also* A.R. Decl. ¶ 14. Indeed, the VDR training that Defendant cited in the prior federal lawsuit, *see* Dkt. 19, at 2 n.1, *Jolt I*—which is materially identical to the VDR training that A.R. completed, *see* A.R. Decl. Ex. B—says in bold, capital letters that VDRs “**MAY NOT** . . . determine if the applicant is actually qualified to register to vote.” *Training for Texas Volunteer Deputy Registrars* 25, <https://perma.cc/54WT-TCFG>.

Finally, with respect to the incident report, Defendant again misrepresents Texas election law. In the report—which also involved A.R., *see* A.R. Decl. ¶ 1—the undercover officer reported that he “stated in a question format that [he] couldn’t have” a registration application for his daughter and that A.R. “replied that since [the officer] ha[d] her information, [he] could register her to vote, alluding to being a parent and that [he] had that right.” Pet. Ex. A. The officer then expressed his belief that “[t]his is not only incorrect but illegal per election code.” *Id.* The problem for the officer (and Defendant) is that Texas law *does* allow parents to register their children to vote. *See* Tex. Elec. Code § 13.003. Once again, *Jolt* refers the Court to the VDR trainings cited by Defendant in the prior litigation and completed by A.R., which explain that VDRs “may allow another registered voter (or anyone who has submitted a registration application) to fill out and sign an application for his/her spouse, parent or child,” so long as the person “ha[s] the permission of the applicant” and “sign[s] the application as ‘agent’ and state[s] the relationship to the applicant on the application.” *Training for Texas Volunteer Deputy Registrars* 21; *see* A.R. Decl. ¶¶ 20-21.

Had the officer more carefully “read the statements at the bottom of the card related to swearing and affirming the information on the card,” Pet. Ex. A, he would have seen that the application asked for the signature of the “Applicant *or Agent*,” A.R. Decl. Ex. A (emphasis added). It is beyond the pale for Defendant to rely on a mistaken incident report to justify the quo warranto petition, when A.R. provided only accurate information---and after the accurate reading of the law was previously explained to the State in the *Jolt I* litigation.

Defendant has thus failed entirely to even allege any conduct by Jolt that would violate any election law. Even taking the allegations in the petition as true, there has been no violation of law, and there is no basis for revoking Jolt’s charter. Defendant’s bad faith allegations based on claims that have already been discredited only underscores his retaliatory intent. Plaintiffs are likely to succeed on the merits of their First Amendment retaliation claim.

B. Section 11(b) of the Voting Rights Act.

Section 11(b) of the Voting Rights Act provides that “[n]o person, whether acting under color of law or otherwise, shall intimidate, threaten, or coerce, or attempt to intimidate, threaten, or coerce any person for voting or attempting to vote, or intimidate, threaten, or coerce, or attempt to intimidate, threaten, or coerce any person for urging or aiding any person to vote or attempt to vote.” 52 U.S.C. § 10307(b). By its terms, the statute prohibits not only intimidation of voters, but also intimidation of organizations and individuals that conduct voter registration. *See Whatley v. City of Vidalia*, 399 F.2d 521, 526 (5th Cir. 1968) (explaining that § 11(b) protects those “assisting . . . others in registering to vote” from “official acts of harassment”). And the statute does not require proof of intent to intimidate (although it would not be difficult to prove intent in this case). Congress intended for § 11(b) to be broader than § 131 of the Civil Rights Act of 1957,

which prohibits intimidation of another only “for the purpose of interfering with the right of such other person to vote.” 52 U.S.C. § 10101(b); *see* H.R. Rep. No. 89-439, at 30 (1965), *as reprinted in* 1965 U.S.C.C.A.N. 2462 (“[U]nlike [§ 131] (which requires proof of a ‘purpose’ to interfere with the right to vote) no subjective purpose or intent need be shown.”).

Although case law interpreting § 11(b) is sparse, courts have construed it broadly. One court recently held, for example, that the provision does not prohibit only threats of “violence or bodily harm,” but that “threats of economic harm, legal action, dissemination of personal information, and surveillance can qualify depending on the circumstances.” *Nat’l Coal. on Black Civic Participation v. Wohl*, 498 F. Supp. 3d 457, 477 (S.D.N.Y. 2020). And another found intimidation where the defendants “linked Plaintiffs’ names and personal information to a report condemning felonious voter registration in a clear effort to subject the named individuals to public opprobrium.” *LULAC v. Pub. Int. Legal Found.*, No. 1:18-CV-00423, 2018 WL 3848404, at *4 (E.D. Va. Aug. 13, 2018); *cf. United States v. Tan Duc Nguyen*, 673 F.3d 1259, 1265 (9th Cir. 2012) (finding probable cause of voter intimidation under California law where “letter targeted immigrant voters with threats that their personal information would be provided to anti-immigration groups”). These interpretations are consistent with § 11(b)’s purpose, which was to strengthen the “existing prohibitions on voter intimidation.” Ben Cady & Tom Glazer, *Voters Strike Back: Litigating Against Modern Voter Intimidation*, 39 N.Y.U. Rev. L. & Soc. Change 173, 177 (2015); *see Voting Rights Act of 1965: Hearings on H.R. 6400 Before the H. Comm. on the Judiciary*, 89th Cong. 12 (1965) (statement of Nicholas deB. Katzenbach, Att’y Gen. of the United States) (noting “inadequacies of present statutes prohibiting voter intimidation”).

For substantially the reasons discussed above with respect to First Amendment retaliation, Jolt has shown a likelihood of intimidation within the meaning of § 11(b). Defendant’s retaliatory campaign against Jolt, starting with the prior investigation and RTE and continuing through the filing of the quo warranto action, are classic examples of the kinds of “official acts of harassment” that § 11(b) prohibits. *See Whatley*, 399 F.2d at 526. The quo warranto petition is explicit that its goal is to stop Jolt from “assisting . . . others in registering to vote.” *Id.* For instance, the petition states that “JOLT acknowledges that it regularly organizes voter registration drives in front of Texas DMV buildings” and contends that “there is no need for a VDR at such locations.” Pet. 5. It alleges without proof that “JOLT’s partisan misconduct attempts to circumvent the opportunity for Republican and Conservative political candidates to get elected in the State.” *Id.* at 9. And the petition seeks to punish Jolt for its disfavored voter-registration activity by revoking Jolt’s charter and “wind[ing] up” Jolt’s operations. *Id.* at 11. Section 11(b) of the Voting Rights Act prohibits Defendant from attempting to put Jolt out of business merely for helping people register to vote.

II. The Remaining Factors Weigh in Favor of a Preliminary Injunction

The other factors also weigh in Jolt’s favor. Given its likelihood of success on its First Amendment claims, Jolt has also shown a likelihood of irreparable harm. *See Opulent Life Church v. City of Holly Springs*, 697 F.3d 279, 295 (5th Cir. 2012) (“[L]oss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury.” (internal quotation marks omitted)). Moreover, Defendant’s campaign of retaliation and intimidation has inflicted and continues to inflict a host of other concrete harms on Jolt, as relevant to both Jolt’s constitutional and statutory claims. Bastard Decl. ¶¶ 51-60. For example, the misinformation that Defendant has broadcast about Jolt in his court filings and public statements has harmed Jolt’s

reputation with peer organizations and partners, requiring Jolt to correct the record including by hiring a crisis communication firm. *Id.* ¶¶ 52-54. As the Texas Supreme Court has recognized, “[a]ccusing someone of a crime” is “so obviously harmful that general damages, such as mental anguish and loss of reputation, are presumed.” *In re Lipsky*, 460 S.W. 3d 579, 596 (Tex. 2015).

Jolt also has had to divert staff time from its core voter-registration activities to administrative tasks that go well beyond what Texas law or best practices require so that it can defend itself against any spurious accusations of wrongdoing. *Id.* ¶ 55. In addition, Jolt has been forced to address staff concerns about harassment and intimidation by Defendant and his supporters by instituting ongoing training on safety and how to deescalate situations in the field. *Id.* ¶ 56. These trainings likewise divert resources from Jolt’s core activities. *Id.* Jolt’s fundraising also has suffered as a result of Defendant’s ongoing retaliatory campaign. *Id.* ¶ 59. Although Jolt’s financial injuries are compensable, the resulting harms to Jolt’s mission are not. Jolt’s depleted finances have forced it to lay off staff, which in turn has negatively affected its ability to register voters. *Id.* ¶ 60. In a typical year without statewide or federal elections, Jolt usually registers over 12,000 voters; in 2025, it has registered only about 3,500 voters. *Id.* That harm to Jolt’s voter-registration efforts ultimately undermines democracy in Texas. *See United States v. Wood*, 295 F.2d 772, 784-85 (5th Cir. 1961) (finding that Mississippi’s prosecution of a voting-rights activist inflicted “irreparable damage to our Government” because “[w]henver any person interferes with the right of any other person to vote . . . he acts like a political termite to destroy a part of that foundation”).

Likewise, with respect to the balance of equities, Jolt has “an obvious interest in the continued exercise of its First Amendment rights, and the State has no legitimate interest in”

retaliating against Jolt and infringing its freedom of association. *Netflix, Inc. v. Babin*, 88 F.4th 1080, 1100 (5th Cir. 2023); *see also Wood*, 295 F.2d at 785 (finding that “temporary postponement” of state enforcement “causes either no injury or very slight injury”). For that reason, “[i]njuncts protecting First Amendment freedoms are always in the public interest.” *OLC*, 697 F.3d at 298 (internal quotation marks and alteration omitted); *see Nken v. Holder*, 556 U.S. 418, 435 (2009) (the balance of equities and public interest “merge when the Government is the opposing party”). For much the same reason, the balance of equities and public interest favor an injunction that stops voter intimidation within the meaning of § 11(b) Defendant’s baseless intimidation campaign is not in the public interest.

CONCLUSION

This Court should grant Jolt’s motion for a preliminary injunction.

Respectfully submitted this November 11th, 2025,

/s/ Mimi Marziani

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**Application for admission pro hac vice forthcoming.*

CERTIFICATE OF SERVICE

I hereby certify that, on November 11, 2025, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system. There is currently no Counsel of Record for Defendant. I certify that I will serve the foregoing on Defendant.

/s/ Mimi Marziani
Mimi Marziani

DECLARATION OF JACQUELINE BASTARD

I, Jackie Bastard, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am the Executive Director at Jolt Initiative. I have served in this role for approximately 10 months. I am over the age of 18, have personal knowledge of the information in this declaration, and am otherwise competent to testify.

2. I have worked at Jolt for six years. Before assuming my position as Executive Director, I served as the Deputy Director and Operations and Human Resources Director.

3. Jolt Initiative is a nonprofit that is federally exempt from taxes as a charitable nonprofit under section 501(c)(3) of the Internal Revenue Code. A separate nonprofit organization, Jolt Action, is federally exempt from taxes under section 501(c)(4) of the Internal Revenue Code. The entities have separate boards and maintain separate bank accounts. Except as otherwise specified, I will use “Jolt” to refer to Jolt Initiative.

4. I am excited to be part of Jolt because it is an organization that empowers, equips, and mobilizes individuals to speak up not only for themselves but for those who are afraid to do so for fear of reprisal.

Jolt Overview

5. Jolt Initiative and Jolt Action were founded in 2016 by Cristina Tzintzún Ramirez. A leading civil rights leader and former 2020 U.S. Senate candidate, she was named “Hero of the New South” by Southern Living Magazine. Her work in the Latino voter advocacy space has been featured on NPR, Vogue, The New York Times, MTV, USA Today, Univision, and MSNBC’s Up Late with Alec Baldwin, among others.

6. Jolt works to increase the civic participation of Latinos in Texas to build a stronger democracy and ensure that everyone’s voice is heard. We are an organization centered

around uplifting the power of young Latino voters in particular. Jolt mobilizes young Latino voters, particularly those between the ages of 18 and 32, with the goal of forging a democracy that works for everyone.

7. Among Jolt's policy platforms is "Democracy for All." We believe that communities of color have immense power, and politicians know it. Texas's Latino population has grown by 2 million in the last decade and Latinos are projected to be the majority group in the state by 2030. We know that voting is a right, not a privilege; nonetheless, Texas has historically discriminated against voters of color and has continuously attempted to suppress their voting power. This is why we are building a movement of young Latinos ready to transform Texas.

8. Jolt believes that Latinos are the future of Texas and that we deserve to have power and respect. That means our elected officials should represent us and value our voices.

9. Jolt also works to build "Respect for Immigrant Families." Texas's diversity is its greatest strength, and as a state where one out of every six Texans is an immigrant, we wholeheartedly recognize that immigrants make this country better. Jolt is mobilizing our young Latino community to stand in support of immigrants.

Voter Registration Efforts

10. Jolt exists to support the Latino community and to encourage our communities to get out and vote in record numbers. Counties are responsible for training VDRs. A vital part of Jolt's mission is reinforcing that training to ensure that community members conduct nonpartisan voter registration in accordance with state law, know how to ensure that registration forms are properly filled out, and adhere to all deadlines and record-keeping requirements.

11. We conduct voter registration drives throughout the state, especially in Dallas, Harris, and Bexar Counties. Because of these drives, many thousands of eligible Texans have been registered to vote in recent years.

12. Many of our employees and volunteers have been certified as Volunteer Deputy Registrars (VDRs) in one or more counties. Under state law, only VDRs may handle voter registration forms before they are submitted to the registrar.

13. To maintain the high quality of its voter registration drives, Jolt trains its VDRs carefully, closely monitors their work, and has several layers of quality control. We do all of our work in compliance with the letter and spirit of all laws, and in consultation with legal counsel.

14. A typical voter registration drive involves a VDR setting up outside a place with high foot traffic, often with a table, a banner, and guidance about voter registration from the counties and the Secretary of State. For example, at times last year, we set up outside Department of Public Safety (DPS) locations because of the high number of people coming and going to conduct business. Although some people at DPS locations have an opportunity to register to vote, not everybody does, such as parents taking their children for driving tests. And even for people who do register at DPS locations, Jolt provides information about how to participate in upcoming elections.

15. At voter registration events, a Jolt VDR will answer questions from passersby who are interested in learning more about voting. Jolt will typically have pamphlets providing information about voting, such as a map of polling locations and information about the times that precincts are open. The VDR will also bring blank voter registration forms.

16. If a person wants to register to vote, a VDR will explain the eligibility requirements, answer any questions, and walk them through the process of filling out a voter

registration form. When the person is finished, the VDR hands the applicant a receipt. Within five days, the VDR will deposit the completed voter registration form with the county registrar.

17. The determination of whether someone is legally allowed to vote is made exclusively by the Secretary of State and county registrars. A VDR simply collects the form and provides it to the appropriate government office for decision. A VDR is not allowed to determine whether someone is actually eligible to vote, and is not legally permitted under Texas law to refuse to submit a completed application to the county registrar.

18. In addition to voter registration drives, Jolt encourages Latinos in Texas to vote through public education campaigns, leadership programming, and other measures.

19. For example, Jolt has a presence in high schools, encouraging students to register when they turn 18, and building the foundation for a lifetime of engaged citizenship. Jolt has also worked to put together the largest research study of Latino voters in Texas history.

20. Jolt's leadership programs provide training to youth on public speaking, advocacy, organizing, and mobilization so that they can be effective leaders in their community. The programs also provide education on voting history and participation among Latinos in the United States.

Other Public Expression

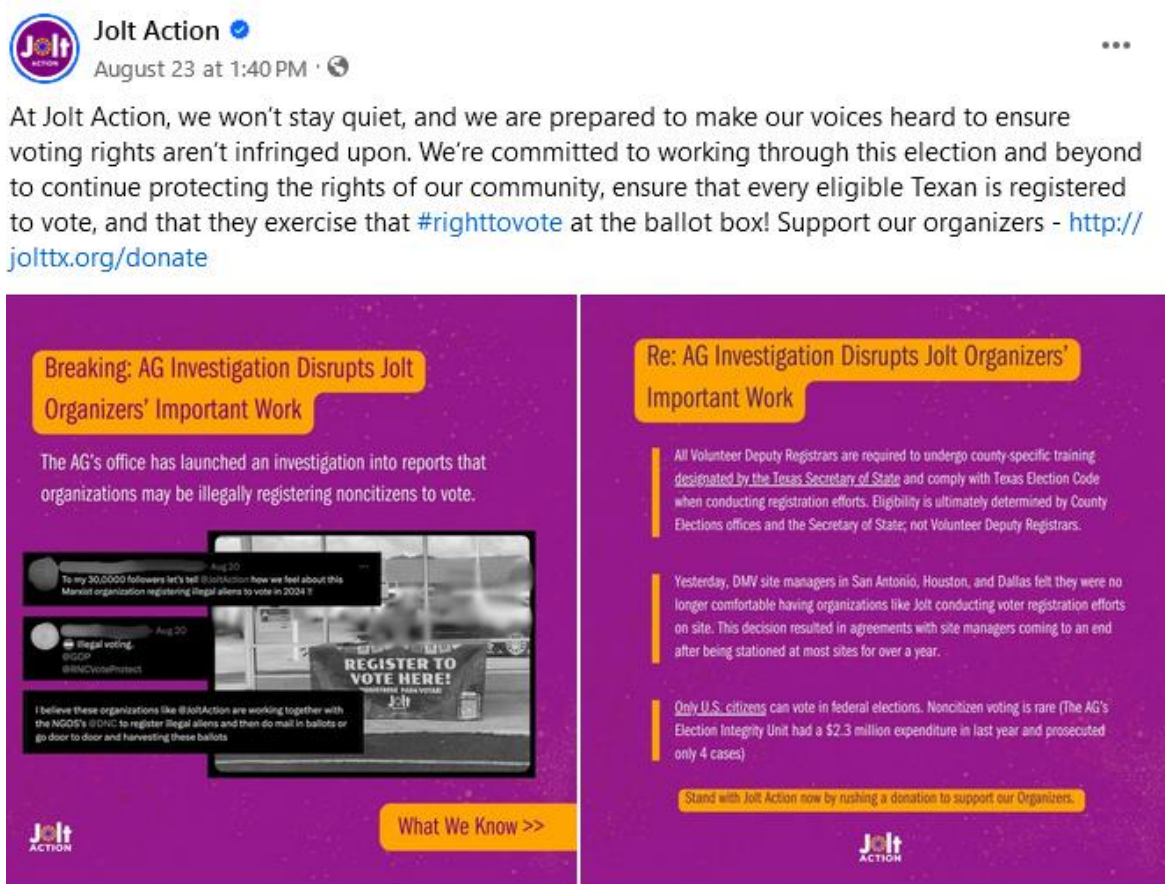
21. Both Jolt and Jolt Action speak out on issues that matter to Latinos in Texas. Both organizations use social media, speak to the press, and send out emails to supporters.

22. Sometimes, these messages are critical of misuses of government power.

23. On August 23, 2024, shortly after the Texas Attorney General raided the homes of six people affiliated with the League of United Latin American Citizens (LULAC), Jolt Action sent out an email blast to thousands of supporters titled: "URGENT: Paxton Investigation

Disrupts Jolt Organizers' Important Work.” In this email, Jolt Action accused the Attorney General of “suppress[ing] voter registration” and “attack[ing] Texans once again.” A true and accurate copy of this email is attached as Exhibit A.

24. Also on August 23, 2024, Jolt Action made the following public post on its Facebook page, declaring “we won’t stay quiet, and we are prepared to make our voices heard to ensure voting rights aren’t infringed upon.” A true and accurate depiction of this post is below:



Social Media Attack in August 2024

25. On August 20, 2024, a X user named “@hernandoarce” posted a video of someone confronting a Jolt VDR. The user wrote “we have Marxist non profit organizations like

@JoltAction infiltrating Texas @TxDPS locations in San Antonio.” The user tagged our Jolt Action X account and @KenPaxtonTx, among others. The post was seen tens of thousands of times, and was reshared by hundreds of people as of the date of this declaration.

26. Jolt leadership immediately became concerned for the safety of all of its employees and VDRs, and shared safety tips on how to handle potentially threatening situations.

27. One day after this post, on August 21, 2024, the Attorney General issued a press release announcing an investigation into Texas nonprofits that conduct voter registration drives, with a focus on those that do so at DPS locations.

Request to Examine

28. Jolt Initiative received a Request to Examine (RTE), dated August 30, 2024, from the Office of the Attorney General. A true and correct copy of the Request to Examine is attached as Exhibit B.

29. The RTE was given to Jolt’s former executive director on August 31, 2024, who then forwarded it to Jolt.

30. The RTE instructed Jolt Initiative to provide, by September 19, 2024, four categories of documents:

1. Each of Your volunteer deputy registrars’ certificates of appointment.
2. All Documents Jolt provides to your volunteer deputy registrars Concerning the voter registration application process.
3. All Documents Jolt provides to your volunteer deputy registrars Concerning Your role in the voter registration application process.
4. Each of the completed registration receipts created pursuant to Texas Election Code § 13.040 and maintained by You.

31. The RTE further provided that failure to comply could lead the Attorney General to seek forfeiture of Jolt’s registration.

Fear of Reprisal

32. Jolt leadership discussed the RTE with board members, who were shaken, upset, and frustrated that Jolt was being unfairly targeted with this demand. The board concluded that it could not comply with the RTE without jeopardizing the safety of its VDRs and the confidence of its partners and the Latino community. If Jolt were to provide the documents requested, it would make it more difficult for Jolt to fulfill its mission of encouraging Latinos to become more politically active.

33. The RTE demanded confidential information, such as the identities of all people who serve with us as VDRs. We do not publicly share the identities of all of our VDRs. Although the identities of some of Jolt Action's staff is public, there are many VDRs whose work with Jolt is not public knowledge.

34. The RTE demanded the certificates of appointment for every VDR associated with Jolt. Certificates of appointment contain additional private information such as the VDR's address and date of birth. We do not publicly share this information about any of our VDRs. Our VDRs would consider our sharing their private information to be a serious breach of trust.

35. Other than submitting their voter registration forms to the appropriate county registrar, we do not publicly share names or other information about the people who we have helped register to vote.

36. If we were forced to provide confidential information about our VDRs to the Attorney General, we feared that he would target our VDRs for baseless intimidation and harassment, as he has done with others.

37. Similarly, if we were forced to disclose the identities of people who we have successfully helped register to vote, we fear that the Attorney General would try to intimidate or

scare them and try to deter them from exercising their right to vote. People who fill out a voter registration form at one of our booths are entrusting us to faithfully deposit their form with the county registrar.

38. Moreover, if we were forced to disclose voters' personally identifying information, we would be betraying the trust that we have carefully earned from the Texas Latino community. Our partners would likely not want to work with us as closely, and it would jeopardize our collaboration with other groups, including donors.

39. Although they have done nothing wrong, people associated with Jolt have every reason to fear the Attorney General's scrutiny. He may go after their friends or family members or try to interfere with their employment. Simply being forced to answer questions or having law enforcement come to your home is intimidating, when all you are trying to do is vote or help others do so.

40. One reason Jolt does its work to increase political power in the community is that many Texans fear reprisal if they are vocal on controversial matters. This concern is especially acute in the Latino community. Many Latinos have friends or family members who are undocumented, and they fear that if they draw attention to themselves, they may place their friends or family at risk. Other Latinos may be going through the process of becoming a citizen, and worry that if they criticize the government or take a controversial stand, they will jeopardize their immigration status.

41. Jolt is particularly concerned about public disclosure of personal identifying information about its employee and volunteer VDRs, as well as personal identifying information about the voters those VDRs help to register. Such disclosure may subject those people to threats, harassing communications, or even place them at risk of violence from extremists who

believe the Attorney General's false accusations that organizations like ours are helping ineligible people register to vote.

42. In fact, after the Attorney General's announcement targeting Jolt, some of our partners have been less willing to collaborate with us publicly. Despite the RTE, we have continued to do our voter registration work every day. But the number of voters who our VDRs have registered has declined noticeably.

Jolt Lawsuit Challenging the RTE

43. Because of our well-founded fears concerning the harms to Jolt, its mission, and the people it serves that would flow from complying with the Attorney General's RTE, Jolt brought a federal lawsuit challenging the RTE under the First and Fourth Amendments to the United States Constitution and under the Voting Rights Act of 1964.

44. Rather than defend against that lawsuit, the Attorney General withdrew his RTE and secured Jolt's agreement to voluntarily dismiss its lawsuit based on written assurances that he would not serve a new RTE concerning the same subject matter.

45. In response to Jolt's voluntary dismissal of its case, the federal court closed the case on October 23, 2025.

Quo Warranto Proceeding

46. That same day, without notice to Jolt or Jolt's counsel before or after filing, the Attorney General filed a motion for leave to file an original petition and information in the nature of quo warranto along with a proposed quo warranto petition in the District Court of Tarrant County, Texas. A true and accurate copy of the Attorney General's motion is attached as Exhibit C, and a true and accurate copy of his proposed quo warranto petition is attached as Exhibit D.

47. Before perfecting service or notifying Jolt's counsel of the filing, the Attorney General released a Press Release titled "Attorney General Ken Paxton Sues Radical Activist Organization for Unlawfully Registering Illegals to Vote in Texas," available at <https://www.texasattorneygeneral.gov/news/releases/attorney-general-ken-paxton-sues-radical-activist-organization-unlawfully-registering-illegals-vote>. The press release falsely describes Jolt as a "radical open-borders group" and "a radical, partisan operation." It also falsely accuses Jolt of "orchestrating a systematic, unlawful voter registration scheme that is designed to sabotage Texas election integrity and allow illegals to vote," "knowingly attempt[ing] to corrupt our voter rolls and weaken the voice of lawful Texas voters," and "recruit[ing] and solicit[ing] individuals to submit unlawful voter registration applications, which could be designed to register illegal aliens who lack proper identification."

48. The Attorney General's quo warranto proceeding is based on the same debunked factual allegations that triggered his RTE motion and sets forth no new evidence of supposed wrongdoing by Jolt or its VDRs.

49. The proposed petition also expressly states that the Attorney General initiated the quo warranto proceeding in response to Jolt's federal lawsuit challenging his RTE, which he describes as a refusal to "cooperat[e] with the State's investigation in any respect" and an effort "to stall the investigation." Pet. 7.

50. The Attorney General's quo warranto proceeding threatens Jolt's very existence by seeking to revoke Jolt's corporate charter.

Harms to Jolt from the Attorney General's Retaliatory Campaign

51. The Attorney General's retaliatory campaign against Jolt has inflicted and continues to inflict significant harms on Jolt.

52. The misinformation that the Attorney General has broadcast about Jolt in his court filings and public statements has harmed Jolt's reputation with peer organizations and partners. Some events with peer organizations have been cancelled because of our partners' fears of being associated with Jolt and targeted for similar harassment by the Attorney General.

53. At a voting-rights convening, some potential new partners have been familiar with Jolt not because of its work to increase civic participation among Latinos, but because of the misinformation that the Attorney General has disseminated about the organization through his public statements and court filings, requiring Jolt staff to correct the record.

54. To counteract the misinformation that the Attorney General is spreading, Jolt has been forced to hire a crisis communications firm at a cost ranging from \$8,500 to \$10,000 per month.

55. Jolt has always taken great care to ensure that its VDRs are well-trained on Texas election law and that all voter registration forms that it gathers are completely and legibly filled out. But Jolt has instituted new administrative tasks that go well beyond what Texas law or best practices require in response to the Attorney General's unjustified and invasive scrutiny of Jolt's activities so that it can defend itself against any spurious accusations of wrongdoing. As a result, Jolt staff who in the past typically spent five to six hours in the field per day now spend around four hours per day in the field, with the remainder of the time undertaking redundant and unnecessary documentation of their activities.

56. Because of staff concerns about harassment by the Attorney General and his supporters, Jolt also has instituted ongoing training on safety and on how to deescalate situations in the field. These trainings have diverted staff time and resources away from voter-registration work.

57. In response to concerns about reprisals by the Attorney General, Jolt also has upgraded its insurance policy to cover staff, increasing its premium from \$9,388 to \$12,238 per year.

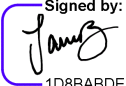
58. The Attorney General's retaliatory campaign also has forced Jolt to hire counsel and specifically fundraise for legal defense funds.

59. At the same time, Jolt's fundraising has suffered, at least in part because of the Attorney General's ongoing retaliatory campaign. At the beginning of the year, Jolt Initiative projected that it would raise \$2.1 million overall, including \$1 million for its voter-registration and civic-education efforts specifically. Instead, it has raised only \$407,722 for general operations, with none of those funds earmarked for the voter-registration and civic-education efforts that are the heart of Jolt's mission.

60. Jolt's deteriorating financial situation has required it to lay off staff, including 11 staff members this summer. This in turn has negatively affected Jolt's ability to register voters. In a typical year without statewide or federal elections, Jolt usually registers over 12,000 voters. In 2025, Jolt has registered only 3,586 voters.

I declare under penalty of perjury that this declaration is true and correct.

Executed on November 10, 2025.

Signed by:

1D8BABDECA35419...

Jaqueline Bastard

EXHIBIT A

TO THE DECLARATION OF JACQUELINE BASTARD



Jackie Bastard <jackie@jolttx.org>

URGENT: Paxton Investigation Disrupts Jolt Organizers' Important Work

Team Jolt <development@jolttx.org>
 Reply-To: development@jolttx.org
 To: Jacqueline Bastard <jackie@jolttx.org>

Fri, Aug 23, 2024 at 10:00 AM



Jacqueline --

In an unsurprising move to suppress voter registration, Texas Attorney General [Ken Paxton has attacked Texans once again](#). **Who this time?** Texas nonprofits including Volunteer Deputy Registrars registering people to vote. As shameless as this is, it's not surprising that the Texas Attorney General is doubling down on voter suppression months ahead of the upcoming November election.

Paxton's office claims it opened this investigation because "organizations operating in Texas may be unlawfully registering noncitizens to vote." This is baseless: [a 2016 study shows](#) that "of 23.5 million votes cast, election officials [only found about 30 cases](#) of potential noncitizen voting that they referred for prosecution or further investigation."

That's .001% out of all votes!

Here's what we know:

- [Only U.S. citizens](#) can vote in federal elections. Noncitizen voting is rare (Paxton's Election Integrity Unit had a **\$2.3 million** expenditure in last year and prosecuted only **4 cases**)
- All Volunteer Deputy Registrars are required to undergo county-specific training [designated by the Texas Secretary of State](#) and comply with Texas Election Code when conducting registration efforts. Eligibility is ultimately determined by County Elections offices and the Secretary of State; not Volunteer Deputy Registrars.
- **Yesterday, DMV site managers in San Antonio, Houston, and Dallas felt they were no longer comfortable having organizations like Jolt conducting voter registration efforts on site.** This decision resulted in agreements with site managers coming to an end after being stationed at most sites for over a year.

Latinos are the majority in Texas and represent the biggest threat to the political status quo. Republicans, including Attorney General Ken Paxton, understand that the only way for them to stay in power is by disenfranchising voters. **But at Jolt Action, we won't stay quiet, and we are prepared to make our voices heard to ensure voting rights aren't infringed upon.** We're committed to working through this election and beyond to continue protecting the rights of our community, ensure that every eligible Texan is registered to vote, and that they exercise that right to vote at the ballot box!

[Stand with Jolt now by rushing a donation to support our Organizers.](#)

We'll keep you updated on this emerging situation.

Team Jolt

Jolt Action
P.O. Box 4185
Austin, TX 78765
<https://jolttx.org/>

If you believe you received this message in error or wish to no longer receive email from us, please
[unsubscribe](#).

EXHIBIT B

TO THE DECLARATION OF JACQUELINE BASTARD



OFFICE OF THE ATTORNEY GENERAL
CONSUMER PROTECTION DIVISION

REQUEST TO EXAMINE

To: Jolt Initiative, Incorporated
P.O. Box 4185
Austin, Texas 78765
c/o Gloria Gonzalez-Dholakia *Via Process Server*
Registered Agent
10304 James Ryan Way
Austin, Texas 78730

Jolt Initiative, Incorporated *Via Process Server*
c/o Board Vice Chair Daniela Rubio
7106 Geneva Drive
Austin, Texas 78723

Re: The Office of the Attorney General's Examination of Jolt Initiative, Incorporated

The Office of the Attorney General, as the representative of the public's interest, has authority to examine any record of a filing entity or foreign filing entity within the meaning of the Texas Business Organizations Code. Tex. Bus. Org. Code § 12.151. Such examination of records may be undertaken in accordance with an investigation under Texas Business Organizations Code Section 12.153 to determine whether a Texas-registered entity's conduct violates its governing documents or any laws of this state.

Jolt Initiative, Incorporated ("Jolt") is a filing entity within the meaning of the Texas Business Organizations Code. Pursuant to this office's specific authority under Texas law, including Texas Business Organizations Code Section 12.151, *et seq.*, the Office of the Attorney General is issuing this Request to Examine (RTE) instructing that Jolt permit the Office of the Attorney General to examine and make copies of or otherwise produce the records set forth in Attachment "A." You are to make available the records described in Attachment "A" to the undersigned Assistant Attorney General or other authorized agent(s). The records may be sent electronically or by certified mail to the Office of the Attorney General, 300 W. 15th. Street, 9th Floor, Austin, TX 78701, and are due on **September 19, 2024**. If providing records electronically, please provide them to Rozanne Lopez at Rozanne.Lopez@oag.texas.gov.

Please contact one of the persons listed below upon receipt to discuss the logistics of producing the requested documents to the Office of the Attorney General.

NOTICE OF RIGHTS AND PENALTIES

TAKE NOTICE THAT you are encouraged to meet and confer with the Office of the Attorney General if you contend that any of the information sought in Exhibit A is constitutionally protected or otherwise legally exempt from production to the Office of the Attorney General.

If you cannot reach agreement with the Office of the Attorney General on the scope of documents sought, you may attempt to obtain judicial review of the RTE before **September 19, 2024** through a “suit for a declaratory judgment,” *Humble Oil & Refining Company v. Daniel* 259 S.W.2d 580, 588 (Tex.App.—Beaumont 1953) (writ ref’d N.R.E.), or a suit for injunctive relief, *City of Elsa v. M.A.L.*, 226 S.W.3d 390, 392 (Tex. 2007).

In such a suit, the Office of the Attorney General will not dispute the availability of judicial review.

TAKE FURTHER NOTICE THAT penalties for a legally unexcused failure or refusal to timely produce records for the Attorney General’s examination include the Office of the Attorney General initiating a legal action for the entity’s “registration or certificate of formation” to “be revoked or terminated.” Tex. Bus. Org. Code § 12.155. If the Office of the Attorney General deems such penalty warranted, proceedings to revoke or terminate an entity’s registration or certificate of formation are initiated through a petition for leave to file an information in the nature of quo warranto. Tex. Civ. Prac. & Rem. Code § 66.002. In such a proceeding, the registered entity is “entitled to” the same rights “as in cases of trial in civil cases.” Tex. R. Civ. P. 781.

ISSUED THIS 30th day of August 2024.

/s/ David Shatto

DAVID SHATTO

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ATTACHMENT "A"

Instructions

1. **Read These Instructions/Definitions Carefully.** Your production must comply with these instructions and definitions.

2. **Duty to Preserve Documents.** All documents and/or other data which relate to the subject matter or requests of this RTE must be preserved. *Any ongoing, scheduled, or other process of document or data destruction involving such documents or data must cease even if it is your normal or routine course of business for you to delete or destroy such documents or data and even if you believe such documents or data are protected from discovery by privilege or otherwise.* Failure to preserve such documents or data may result in legal action and may be regarded as spoliation of evidence under applicable law.

3. **Relevant Dates.** Unless otherwise noted, the requests in this RTE require production of documents from June 1, 2024, to the date of the production of documents in response to this RTE, herein called "the relevant time period."

4. **Custody and Control.** In responding to this RTE, you are required to produce not only all requested documents in your physical possession, but also all requested documents within your custody and control. A document is in your custody and control if it is in the possession of another person and you have a right to possess that document that is equal or superior to that other person's right of possession. On the rare occasion that you cannot obtain the document, you must provide an explanation as to why you cannot obtain the document which includes the following information:

- a. the name of each author, sender, creator, and initiator of such document;
- b. the name of each recipient, addressee, or party for whom such document was intended;
- c. the date the document was created;
- d. the date(s) the document was in use;
- e. a detailed description of the content of the document;
- f. the reason it is no longer in your possession, custody, or control; and
- g. the document's present whereabouts.

If the document is no longer in existence, in addition to providing the information indicated above, state on whose instructions the document was destroyed or otherwise disposed of, and the date and manner of the destruction or disposal.

5. **Non-identical Copies to be Produced.** Any copy of a document that differs in any manner, including the presence of handwritten notations, different senders or recipients, etc. must be produced.

6. **Redaction.** All unprivileged materials or documents produced in response to this RTE

shall be produced in complete unabridged, unedited, and unredacted form, even if portions may contain information not explicitly requested, or might include interim or final editions of a document. Privileged information must be handled in accordance with Instruction Number 9, below.

7. **Document Organization.** Each document and other tangible thing produced shall be clearly designated as to which request, and each sub-part of a request, that it satisfies. The documents produced shall be identified and segregated to correspond with the number and subsection of the request.

8. **Production of Documents.** You may submit photocopies (with color photocopies where necessary to interpret the document) in lieu of original hard-copy documents if the photocopies provided are true, correct, and complete copies of the original documents. If the requested information is electronically stored information, it shall be produced in electronic form. Electronically stored information shall be produced with the accompanying metadata, codes, and programs necessary for translating it into usable form, or the information shall be produced in a finished usable form. For any questions related to the production of documents you may consult with the Office of the Attorney General representatives above.

9. **Privilege Log.** For each Document and any other requested information that you assert is privileged or for any other reason excludable from production, please provide a privilege log, wherein you:

- a. Identify that Document and other requested information;
- b. State each specific ground for the claim of privilege or other ground for exclusion and the facts supporting each claim of privilege or other ground for exclusion;
- c. State the date of the Document or other requested information; the name, job title, and address (including city, state and ZIP Code) of the person who prepared it; the name, address (including city, state, and ZIP Code), and job title of the person to whom it was addressed or circulated or who saw it; and the name, job title, and address (including city, state, and ZIP Code) of the person now in possession of it; and
- d. Describe the type and subject matter of the Document or other requested information.

Definitions

1. **"You," "your," "Jolt"** means Jolt Initiative, Inc., their past and present officers, employees, agents and representatives, parents and predecessors, divisions, subsidiaries, affiliates, partnerships and joint ventures, and includes all persons and entities acting or purporting to act under the guidance or on behalf of any of the above. The terms "subsidiary," "affiliate," and "joint venture" refer to any firm in which there is total or partial ownership (25 percent or more) or control between the company and any other person or entity.
2. The words **"and"** and **"or"** shall be construed either conjunctively or disjunctively as required by the context to bring within the scope of the request, any document(s) that might be deemed outside its scope by another construction.
3. **"Concerning"** or **"Relating to"** or **"Related to"** means related to, referring to, pertaining to, concerning, describing, regarding, evidencing, or constituting.
4. **"Document"** shall be construed in the broadest sense possible and encompasses any electronically stored information, writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations—stored in any medium from which information can be obtained either directly or, if necessary, after translation by Spirit into a reasonably usable form. Although it does not limit the scope of this RTE, the definition and interpretation of "document" under the Texas Rules of Civil Procedure provides a useful reference point.
5. **"Entity"** means legal or business entity of any kind and includes, without limitation, corporations, partnerships, joint ventures, associations, governmental bodies, and trusts.
6. **"Including"** means including, but not limited to.
7. **"Person"** means any natural person or any legal entity, including, without limitation, any corporation, company, limited liability company or corporation, partnership, limited partnership, association, or firm.

Documents to be Produced

In accordance with the requirements set forth in the "Definitions" and "Instructions" sections of this RTE, you are specifically instructed to produce the following:

By September 19, 2024:

1. Each of Your volunteer deputy registrars' certificates of appointment.
2. All Documents Jolt provides to your volunteer deputy registrars Concerning the voter registration application process.
3. All Documents Jolt provides to your volunteer deputy registrars Concerning Your role in the voter registration application process.
4. Each of the completed registration receipts created pursuant to Texas Election Code § 13.040 and maintained by You.

EXHIBIT C

TO THE DECLARATION OF JACQUELINE BASTARD

352-371410-25

CAUSE NO. _____

STATE OF TEXAS,
Plaintiff,

v.

JOLT INITIATIVE, INC.,
Defendant.

§
§
§
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§
§
§
§
§

IN THE DISTRICT COURT OF

TARRANT COUNTY, TEXAS

_____ JUDICIAL DISTRICT

**STATE’S MOTION FOR LEAVE TO FILE ITS ORIGINAL PETITION
AND INFORMATION IN THE NATURE OF *QUO WARRANTO***

COMES NOW, Plaintiff the State of Texas (“State”), and moves this Court for leave to file its Original Petition and Information in the Nature of *Quo Warranto* pursuant to the Texas Election Code and Civil Practice and Remedies Code, Title 3, Chapter 66. In support hereof, the State would show as follows:

I. MOTION FOR LEAVE

1. The State moves this Court for leave to file its Original Petition in the Nature of *Quo Warranto* (attached hereto as “Exhibit A”) against Defendant JOLT Initiative, Inc. (“JOLT”). Tex. Civ. Prac. & Rem. Code § 66.001; Tex. Civ. Prac. & Rem. Code § 66.002; Tex. Civ. Prac. & Rem. Code § 66.003; Tex. Gov’t Code § 402.023.

2. “In Texas, the attorney general’s power and duty to file *quo warranto* proceedings were incorporated into the Texas Constitution.” *See Paxton v. FIEL Houston, Inc.*, 2025 Tex. App. LEXIS 7796, *4-5 (Tex. App.—Austin 2025); *see also* Tex. Const. art. IV, § 22.

3. The application for “*quo warranto* must ... be pursued governmentally; where it is

available, [Texas Supreme Court] recently reiterated that the writ is exclusive and can only be brought by the attorney general” See *Paxton v. Annunciation House, Inc.*, No. 24-0573, 2025 Tex. LEXIS 436, *22 (Tex. 2025).

4. “The Texas Supreme Court recently recognized that this provision gives the attorney general broad constitutional authority to seek charter revocation in the courts through *quo warranto* actions and the discretion to determine whether there is sufficient cause to do so, except in those circumstances where the Legislature requires the attorney general to take *quo warranto* action or, conversely, expressly prohibits the attorney general from taking *quo warranto* action.” See *Paxton*, 2025 Tex. App. LEXIS 7796, at *4-5.

5. Generally, the Texas Attorney General is statutorily required to “seek a judicial forfeiture of a private corporation’s charter if sufficient cause exists.” See Tex. Gov’t Code § 402.023(a).

6. The Supreme Court of Texas recently clarified that “sufficient cause ... refers to [the Attorney General’s] discretion under existing law without depending on specific determinations by the legislature, so long as the legislature has not clearly withdrawn a particular kind of action from *quo warranto*’s reach.” See *Paxton*, No. 24-0573, LEXIS 436, at *35.

7. The determination whether “sufficient cause” exists can be based upon evidence of criminal violations. *Humble Oil & Refining Co. v. Daneil*, 259 S.W.2d 580, 589-90 (Civ. Ct.—App. Tx. 1953); *Chesterfield Fin. Co. v. Wilson*, 328 S.W.2d 479, 482 (Tex. App—Eastland 1959); *Paxton*, No. 24-0573, 2025 Tex. LEXIS 436, at *39.

8. “When deciding a motion for leave to file *quo warranto*, courts apply a sufficiency-

of-the-pleadings standard. That is, to determine whether the State has demonstrated ... there is ‘probable ground’ for the requested *quo warranto* action to proceed, the trial court must accept as true the allegations in the State’s petition and determine whether the petition states a cause of action for which *quo warranto* is authorized.” *See Paxton*, 2025 Tex. App. LEXIS 7796, at *6.

9. JOLT is a domestic nonprofit corporation organized under the laws of the State of Texas and registered to transact business in Texas, which are alleged within the proposed pleading. *See Exhibit A*.

10. The State request this Court to revoke the corporate charter and corporate registration for JOLT on the ground(s) that the nonprofit corporation systemically, knowingly, willfully, deliberately, and recklessly misuses individuals and Volunteer Deputy Registrars (“VDR”) to acquire and submit unlawful voter registration applications that violate the Texas Election Code and undermine the State’s democratic processes. *See Exhibit A*.

11. The proposed pleading and exhibits annexed thereto are fully incorporated herein by reference.

12. The proposed pleading and exhibits set forth the factual assertions further explaining the nature of JOLT’s statutory violations pursuant to the Texas Election Code. *See Exhibit A*.

13. When accepted as true, these allegations are sufficient to establish probable grounds for the State’s filing. *Exhibit A; Paxton*, 2025 Tex. App. LEXIS 7796, at *6; Tex. Civ. Prac. & Rem. Code § 66.002(d); *Paxton*, No. 24-0573, 2025 Tex. LEXIS 436, at *49-50 (“The current statute requires only a ‘probable ground for the proceeding’ to justify filing. Filing the action merely opens the door to the litigation process, which requires probative evidence for the attorney general to

prevail. A motion for leave is therefore not an opportunity to litigate the entire case before it is even filed.”).

14. Here, the proposed pleading unquestionably “states a cause of action for ... *quo warranto*” pursuant to the Texas Election Code and Texas Civil Practice and Remedies Code. Exhibit A; *Paxton*, 2025 Tex. App. LEXIS 7796, at *6; *Paxton*, No. 24-0573, 2025 Tex. LEXIS 436, at *45-6.

II. PRAYER

15. Accordingly, the State requests that this Court grant it leave to file its Original Petition in the Nature of *Quo Warranto* for the reasons stated herein and those set forth in the proposed Petition attached hereto as Exhibit A, declare that such Petition is hereby filed, and for all other relief to which the State may be entitled.

Respectfully submitted,

KEN PAXTON
Attorney General of Texas

BRENT WEBSTER
First Assistant Attorney General

RALPH MOLINA
Deputy First Assistant Attorney General

AUSTIN KINGHORN
Deputy Attorney General for Civil Litigation

JOHNATHAN STONE
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/s/ Ian Bergstrom
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ATTORNEYS FOR THE STATE OF TEXAS

EXHIBIT D

TO THE DECLARATION OF JACQUELINE BASTARD

CAUSE NO. _____

STATE OF TEXAS,	§	IN THE DISTRICT COURT OF
<i>Plaintiff,</i>	§	
	§	
	§	
	§	
v.	§	TARRANT COUNTY, TEXAS
	§	
	§	
JOLT INITIATIVE, INC.,	§	
<i>Defendant.</i>	§	_____ JUDICIAL DISTRICT

**STATE'S PETITION AND INFORMATION
IN THE NATURE OF QUO WARRANTO**

Votes matter only if elections are fair and honest. Defendant JOLT Initiative, Inc. ("JOLT") is a radical nonprofit corporation that commits criminal conduct pertaining to voter registration applications in Texas. JOLT and its Volunteer Deputy Registrars ("VDRs") are systematically subverting the election process and violating Texas election law by recruiting, training, and directing individuals to submit false, or otherwise unlawful, voter registration applications. These are not innocent mistakes, but rather criminal acts that can dilute legitimate votes undermining public confidence in election outcomes. JOLT falsely states to the public that its mission is nonpartisan. But it is not. JOLT has publicly declared its resentment for Republican and Conservative political ideology. And, to this end, JOLT's efforts are intended to unlawfully tilt elections against causes and candidates that they dislike.

Plaintiff State of Texas ("State") will not stand by while bad actors like JOLT compromise election integrity in Texas. The State therefore files this Petition and Information in the Nature of *Quo Warranto* pursuant to Tex. Const. art. IV, § 22, Tex. Civ. Prac. & Rem. Code § 66.001, Tex. Civ. Prac. § Rem. Code § 66.003, and offers the following in support:

I. DISCOVERY CONTROL PLAN

1. Discovery is intended to be conducted under Level 3 of Texas Rule of Civil Procedure 190.

II. THE PARTIES

2. The Texas Attorney General brings this lawsuit in the name of the State of Texas.

3. Plaintiff the State is a sovereign entity that “has an intrinsic right to enact, interpret, and enforce its own laws.”¹

4. Defendant JOLT is a domestic nonprofit corporation organized under the laws of the State of Texas and may be served through its registered agent, Jacqueline Bastard, located at 241 N. Milby Street, Suite D, Houston, Texas 77003, or wherever the registered agent may be found. A citation is requested at this time.

III. STATEMENT OF RELIEF

5. Pursuant to Tex. R. Civ. P. 47(c), the State seeks only non-monetary relief.

IV. JURISDICTION AND VENUE

6. Venue is proper in Tarrant County because a substantial part of the events or omissions giving rise to the State’s claims occurred in Tarrant County.²

7. The State and Texas Attorney General are authorized by statute and the Texas Constitution to commence quo warranto proceedings against corporate entities, such as JOLT, for violations of the law. *See* Tex. Civ. Prac. & Rem. Code § 66.002(a)-(c); *see also* Tex. Const. art. IV, § 22.

¹ *See State v. Naylor*, 466 S.W.3d 783, 790 (Tex. 2015).

² *See* Tex. Civ. Prac. & Rem. Code §§ 15.002(a)(1); *see also* Tex. Civ. Prac. & Rem. Code § 66.002(a).

8. As described herein, JOLT systematically and repeatedly commits criminal violations regarding voter registration pursuant to the Texas Election Code. Consequently, the State and Texas Attorney General commence this quo warranto proceeding to prevent JOLT's systematic violations of the Texas Election Code, to prevent corporate illegality, and to terminate JOLT's right to conduct business in this State.

V. FACTUAL BACKGROUND

A. JOLT

9. JOLT was founded in 2016 after the initial election of President Donald J. Trump.³

10. JOLT describes its founding mission as “fight[ing] back against the politics of hate” regarding the election of President Donald J. Trump.⁴

11. JOLT publicly proclaims that its purpose is to “mobilize[] young Latino voters” to become involved with politics and voting,⁵ JOLT asserts that it “trains community members to conduct [purported] nonpartisan voter registration,” and that it enables the “form[ation] [of] student chapters at” educational institutions.⁶

12. JOLT asserts that its political organization is “nonpartisan,” but yet it simultaneously and continually criticizes and demonizes the election of Republican and Conservative politicians, such as President Donald J. Trump.⁷

³ See *JOLT HISTORY*, JOLT INITIATIVE, available at <https://www.joltinitiative.org/jolt-history>.

⁴ See *id.*

⁵ See *id.*

⁶ See *ABOUT*, JOLT INITIATIVE, available at <https://www.joltinitiative.org/about>.

⁷ See *JOLT History*, *supra*; see also JOLT INITIATIVE, 2024 ANNUAL REPORT, p. 3, available at <https://www.joltinitiative.org/wp-content/uploads/2025/01/2024-Jolt-Initiative-GOTV-Report-mobile.pdf> (“While the 2024 election results were disappointing, it is important that we understand the root frustrations that led to these shifts within the broader-working class bloc.”).

13. In addition to this divisive rhetoric, JOLT perpetrates criminal voting schemes to solicit and train VDRs how to instruct the public to (a) submit unlawful voter registration applications and (b) otherwise attempt to unlawfully register themselves and others to vote.

B. The State Learns of JOLT's Unlawful Election Interference Scheme

14. The State requires voter registration applications to set forth the Texas driver's license numbers and Texas personal identification numbers that DPS issues to the public. If an individual does not have the driver's license and personal identification numbers, then the last 4 digits of a social security number is acceptable.⁸ The voter registration application sets forth an option for the applicant to state the lack of a Texas driver's license number, Texas personal identification number, and/or social security number.⁹

15. In August 2024, Maria Bartimoro¹⁰ publicly posted that Texas Department of Motor Vehicle ("DMV") locations "[h]ad ... massive line[s] of immigrants getting licenses" and voter registration setups stationed outside of the DMV locations.¹¹

16. Following these reports, Texas Attorney General, Ken Paxton, initiated an investigation and dispatched an undercover investigator to a DMV location in Universal City,

⁸ See *Texas Voter Registration Application*, ¶9, OFFICE OF THE SECRETARY OF STATE, available at <https://www.sos.state.tx.us/elections/forms/vr-with-receipt.pdf>.

⁹ See *id.*; see also Tex. Elec. Code § 13.002(c)(8)(A)-(C).

¹⁰ Maria Bartimoro is an award-winning journalist and prominent anchor for Fox Business News. See generally *Maria Bartimoro*, NATIONAL ITALIAN AMERICAN FOUNDATION, available at <https://www.niaf.org/wallofhonor/maria-bartiromo> (Maria Bartimoro received multiple Emmy awards); see generally *Legends Live @Citi: Maria Bartimoro*, CITI (Oct. 15, 2025), available at <https://www.citigroup.com/global/news/perspective/2025/legends-live-citi-maria-bartiromo>; see generally *Maria Bartimoro*, FOX BUSINESS, available at <https://www.foxbusiness.com/person/b/maria-bartiromo>.

¹¹ See *Maria Bartimoro*, X, available at <https://x.com/MariaBartiromo/status/1825169849363972404?lang=en>.

Texas, to determine whether unlawful voter registration efforts were taking place. *See* Exhibit A, ¶2.1. When the investigator arrived at the DMV location, he made contact with a JOLT VDR and represented himself as a father seeking to register his daughter, who was not with him. In spite of the absence of his daughter, the JOLT VDR instructed the undercover agent as to how the agent could submit a voter registration application on behalf of his fictitious daughter.

17. After departing this encounter, the investigator reported to the State that JOLT's conduct at the voter registration location was unlawful pursuant to the Texas Election Code. *See* Exhibit A, ¶2.4.

18. Importantly, JOLT does not dispute that it engages in this type of conduct at these types of locations. In fact, JOLT acknowledges that it regularly organizes voter registration drives in front of Texas DMV buildings and it engages in these same voter registration drives throughout the state.”¹² *See* Exhibit B, ¶11-12, p. 3. Further, JOLT asserts that it has a “dedicated presence at hundreds of ... local DMVs, and naturalization ceremonies” in the State.¹³ To this end, the investigator's description of the JOLT voter registration setup is consistent with JOLT's description. *See* Exhibit A, ¶2.2; *see also* Exhibit B, ¶14, p. 3-4.

19. JOLT's decision to conduct its voter registration efforts outside of DMV locations illuminates its unlawful motive too. This is because U.S. citizens can already register to vote at any DMV with proof of citizenship. Thus, there is no need for a VDR at such locations.

20. But, because voter registration applications allow an individual to apply for registration without a state-issued ID or social security number, by simply stating that the applicant

¹² JOLT publicly filed the declaration of Jacqueline Bastard. *See* Exhibit B.

¹³ JOLT INITIATIVE, *supra*, ¶3, p. 4.

has not been issued such an ID or social security number, there is room for illegal aliens to submit applications. Of course, they cannot do so at the DMV, however, because then they could not claim to lack an ID. So, instead, JOLT dispatches its VDRs to these locations for the purpose of allowing and soliciting illegal aliens to submit voter registration applications without IDs or social security numbers.

21. In fact, JOLT admits that it does not attempt to determine the potential eligibility of the public to become registered voters under State law(s). *See* Exhibit B, ¶17, p. 4. Rather, JOLT conveniently shifts blame to the Texas Secretary of State “and county registrars” to vet the voting eligibility of the public. *See* Exhibit B, ¶17, p. 4.

22. During one widely viewed encounter, a JOLT VDR informed an individual that illegal alien could submit a voter registration application “if they really wanted to,” which directly contravenes State law^(s).¹⁴

23. JOLT misuses its corporation to recruit and train VDRs to assist the public with completing and submitting untruthful voter registration applications.

24. JOLT is engaged in systematic violations of Texas election laws by enabling, facilitating, directing, coercing, and attempting to induce individuals to submit false statements in their voter registration applications.

¹⁴ *See @hernandoarce, X* (Aug. 20, 2024, 12:53 p.m.), *available at* <https://x.com/hernandoarce/status/1825954284858417608>; *compare* Tex. Elec. Code § 13.002(c)(3); *compare Texas Law*, ELECTION ADVISORY NO. 2024-19, *available at* <https://www.sos.state.tx.us/elections/laws/advisory2024-19.shtml#:~:text=The%20state%2Ddesigned%20and%20federally,at%20their%20last%20DPS%20transaction.>

25. JOLT's criminal and devious actions undermine the efforts of the State to ensure the lawful administration of elections and election integrity as described herein.

C. The State Attempted Further Investigation and JOLT Sued to Prevent Such Efforts.

26. Following the State's undercover investigation, on August 30, 2024, the Attorney General's Consumer Protection Division served a Request to Examine ("RTE") upon JOLT demanding disclosure of certain statutorily-mandated certificates of appointment, documents, and completed voting registration receipts pertaining to JOLT's VDR.

27. But rather than producing any documents or cooperating with the State's investigation in any respect, JOLT commenced a federal lawsuit to stall the investigation through the 2024 election.

28. As of the time of this filing, however, the State and JOLT have filed a joint stipulation of dismissal in the federal lawsuit and the State has agreed that it will not re-issue another pre-suit administrative subpoena seeking the same documents that were the subject of the federal lawsuit.

29. Instead, the State now commences this lawsuit to hold JOLT accountable for its underlying systematic and unlawful conduct and to revoke JOLT's right to transact business in Texas.

30. The termination of JOLT's corporation is necessary to uphold public confidence and protect the legitimacy of the legal voting process.

X. LEGAL CLAIMS

A. *Quo Warranto*

31. The State incorporates the foregoing allegations as if set forth fully herein.

32. Generally, the Texas Attorney General is required to “seek a judicial forfeiture of a private corporation’s charter if sufficient cause exists.”¹⁵

33. The Supreme Court of Texas recently clarified that “sufficient cause ... refers to [the Attorney General’s] discretion under existing law without depending on specific determinations by the legislature, so long as the legislature has not clearly withdrawn a particular kind of action from *quo warranto*’s reach.”¹⁶

34. The determination whether “sufficient cause” exists can be based upon evidence of criminal violations.¹⁷

35. To this end, the Texas Attorney General has the constitutional power to pursue “charter revocation ... through quo warranto actions”¹⁸

36. In the present case, the State and Texas Attorney General determined that “sufficient cause” exists to proceed with a quo warranto proceeding against JOLT because of the aforementioned circumstances and violations of the Texas Election Code.

37. The State and Texas Attorney General acquired evidence about the unlawful voting registration activities based upon the undercover operation and other information learned during investigations.

¹⁵ See Tex. Gov’t Code § 402.023(a); see also *Paxton*, 2025 Tex. App. LEXIS 7796, at *4-5.

¹⁶ See *Paxton v. Annunciation House, Inc.*, No. 24-0573, 2025 Tex. LEXIS 436, *35 (Tex. 2025).

¹⁷ *Humble Oil*, 259 S.W.2d at 589-90; *Chesterfield Fin. Co. v. Wilson*, 328 S.W.2d 479, 482 (Tex. App.—Eastland 1959) (“violation of the usury laws would involve a violation of [the company’s] rights and privileges and violations of statutes enacted for the purpose of controlling and regulating them”); *State v. Sm. Bell Tel. Co.*, 526 S.W.2d 526, 531 (Tex. 1975) (“unreasonably high—and hence unlawful—charges for [telephone] service by the people of Texas would be an abuse of [company’s] corporate power” and Attorney General “is authorized to take action in the courts to enjoin this being done”); *Paxton*, No. 24-0573, 2025 Tex. LEXIS 436, at *39.

¹⁸ See *Paxton v. FIEL Houston, Inc.*, 2025 Tex. App. LEXIS 7796, *4-5 (Tex. App.—Austin 2025); see also Tex. Const. art. IV, § 22.

38. The State establishes “probable ground” to prosecute the quo warranto proceeding because of the allegations described herein and exhibits annexed hereto¹⁹ pursuant to Tex. Civ. Prac. & Rem. Code § 66.002(d).

39. JOLT operates near DPS and DMV facilities interacting with the public and JOLT sets forth false information about the ability of individuals to register as voters in the State violating the Texas Election Code.

40. JOLT engages in partisan political efforts intending to undermine election integrity.

41. JOLT’s partisan misconduct attempts to circumvent the opportunity for Republican and Conservative political candidates to get elected in the State violating the principles of democracy and Texas Election Code.

42. JOLT is engaged in systematic conduct that is unlawful and intended to interfere with Texas’ elections and thwart the democratic process, by *inter alia*:

- a. Enabling, facilitating, directing, coercing, and attempting to induce individuals to submit false statements in voter registration applications;²⁰
- b. Recruiting, training, and hiring VDRs to assist and encourage individuals with submitting false statements in voter registration applications;²¹
- c. Systematically enabling, facilitating, directing, coercing, and attempting to induce individuals to submit false statements in voter registration applications;²²
- d. Recruiting, training, and hiring VDRs to assist individuals with submitting untruthful voter registration applications;²³

¹⁹ The State incorporates the statements throughout the attached exhibits into the petition by reference.

²⁰ See Tex. Civ. Prac. & Remedies Code Section 66.001(1); *see also* Tex. Elec. Code § 13.007(1)(2).

²¹ See Tex. Civ. Prac. & Remedies Code Section 66.001(1); Tex. Elec. Code § 13.007(1)(2).

²² See Tex. Civ. Prac. & Remedies Code Section 66.001(4); *see also* Tex. Elec. Code § 13.007(1)(2).

²³ See Tex. Civ. Prac. & Remedies Code Section 66.001(4).

- e. Systematically enabling, facilitating, directing, coercing, and attempting to induce individuals to submit false statements in voter registration applications;²⁴
- f. Recruiting, training, and hiring VDRs to assist individuals with submitting false statements in voting registration applications;²⁵ and
- g. Recruiting, training, and hiring VDRs to solicit and accept voter registration applications for individuals that are not present.

43. This Court terminating JOLT's nonprofit corporation and granting the *quo warranto* relief is the most effective method to ensure the fairness of elections in the State.

XI. CORPORATE LIABILITY

44. The State incorporates the foregoing allegations as if set forth fully herein.

45. JOLT is liable for the acts and omissions alleged herein because its corporate acts and omissions were systemically, knowingly, willfully, deliberately, and recklessly tolerated by JOLT, JOLT Board of Directors, JOLT officers, JOLT agents, JOLT volunteers, and JOLT employees acting on behalf of the corporation and within the scope of their office, employment, agency, and representation.

XII. NOTICE OF LIEN

46. Pursuant to Pursuant to Tex. Bus. Orgs. Code § 12.201, this filing of the suit operates as a notice of lien on all JOLT property in the State of Texas.

XIII. PRAYER

47. The State incorporates by reference the preceding paragraphs as if fully set forth herein.

²⁴ See Tex. Civ. Prac. & Remedies Code Section 66.001(5); *see also* Tex. Elec. Code § 13.007(1)(2).

²⁵ See Tex. Civ. Prac. & Remedies Code Section 66.001(5).

48. As explained above, JOLT has performed or omitted corporate acts requiring surrender and/or forfeiture of its rights and privileges as a corporation registered to transact business in Texas pursuant to Tex. Gov't Code § 402.023 and Civ. Prac. & Rem. Code § 66.001.

49. NOW THEREFORE, the State respectfully prays that the Court enter judgment in its favor and order the following:

- a. *quo warranto* relief is warranted;
- b. forfeiture of JOLT's rights and privileges as a registered corporation;
- c. dissolution of JOLT's corporate registration and corporate charter;
- d. appointment of a receiver to wind up JOLT's corporate affairs;
- e. payment of attorneys' fees, litigation expenses, and costs; and
- f. any and all further relief to which the State may be entitled.

Respectfully submitted,

KEN PAXTON
Attorney General of Texas

BRENT WEBSTER
First Assistant Attorney General

RALPH MOLINA
Deputy First Assistant Attorney General

AUSTIN KINGHORN
Deputy Attorney General for Civil Litigation

JOHNATHAN STONE
Chief, Consumer Protection Division
State Bar No. 24071779

/s/ Ian Bergstrom
IAN BERGSTROM
Assistant Attorney General

State Bar No. 24145952
Consumer Protection Division
Office of the Attorney General
P.O. Box 12548
Austin, Texas 78711-2548
Telephone No.: 512-475-3042
Facsimile No.: 512-473-8301

ATTORNEYS FOR THE STATE OF TEXAS

Exhibit A



**Office of the Attorney General
Law Enforcement Division**

PO Box 12548
Austin, TX 78711

Supplement

Page **1**

Incident # **CX8629607278**

Title

Reported **08/21/2024 13:48 Wednesday**

2.1 On 8-19-2024 I was asked to proceed to Texas Department of Public Safety driver's license office located at 1633 Pat Booker Road, Universal City, Texas. I was notified that voter registration was possibly occurring in or about the area surrounding the driver's license office. I arrived at the location of the driver's license office and observed a table in close proximity to the front door and observed a young man sitting at a table in front of the driver's license building. After parking the vehicle, I removed my identifiers and approached the young man at the table.

2.2 The white table length banner displayed the name JOLT in a logo and two QR codes, as I recall one QR code to volunteer the other QR code to give a donation. I approached and told the male I was wanting my daughter to register to vote and if I could have a form to take to her. He said that he could not let me have a form while he was opening a binder/folder that held a stack of voter registration cards. The stack of registration cards were rubberbanded with several areas highlighted and the name "██████████" at the bottom. These are cards I have encountered multiple times in the execution of my duties which I recognize to be voter registration cards. I observed additional loose forms within the storage area of the binder but I was not able to identify these cards because the binder/folder was open for no more than ten seconds. This action was done with his right hand and his forearm obscuring part of my vision into the folder/binder.

2.3 I stated in a question format that I couldn't have one, and ██████████ replied that since I have her information, I could register her to vote, alluding to being a parent and that I had that right. This was inferreing that I could sign her voter registration card, and while ██████████ made this statement he overtly looked away.

2.4 This is not only incorrect but illegal per election code. I next read the statements at the bottom of the card related to swearing and affirming the information on the card and I said it was best to bring her by and departed the table.

Officer ID ██████████	Agency OAG	Reviewed By Stanley Roper, Lt.	Date 09/27/2024
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Exhibit B

DECLARATION OF JACQUELINE BASTARD

I, Jacqueline Bastard, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am the Deputy Director at Jolt Initiative. I have served in this role for 4 years. I am over the age of 18, have personal knowledge of the information in this declaration, and am otherwise competent to testify.

2. I have worked at Jolt for five years. Before assuming my position as Deputy Director, I served as the Operations and Human Resources Director.

3. Jolt Initiative is a nonprofit that is federally exempt from taxes as a charitable nonprofit under section 501(c)(3) of the Internal Revenue Code. A separate nonprofit organization, Jolt Action, is federally exempt from taxes under section 501(c)(4) of the Internal Revenue Code. The entities have separate boards and maintain separate bank accounts. Except as otherwise specified, I will use “Jolt” to refer to Jolt Initiative.

4. I am excited to be part of Jolt because it is an organization that empowers, equips, and mobilizes individuals to speak up not only for themselves but for those who are afraid to do so for fear of reprisal.

Jolt Overview

5. Jolt Initiative and Jolt Action were founded in 2016 by Cristina Tzintzún Ramirez. Jolt Initiative was incorporated in 2017. Jolt Action was incorporated in 2016. A leading civil rights leader and former 2020 U.S. Senate candidate, she was named “Hero of the New South” by Southern Living Magazine. Her work in the Latino voter advocacy space has been featured on NPR, Vogue, The

New York Times, MTV, USA Today, Univision, and MSNBC's Up Late with Alec Baldwin, among others.

6. Jolt works to increase the civic participation of Latinos in Texas to build a stronger democracy and ensure that everyone's voice is heard. We are an organization centered around uplifting the power of young Latino voters in particular. Jolt mobilizes young Latino voters, particularly those between the ages of 18 and 32, with the goal of forging a democracy that works for everyone.

7. Among Jolt's policy platforms is "Democracy for All." We believe that communities of color have immense power, and politicians know it. Texas's Latino population has grown by 2 million in the last decade and Latinos are projected to be the majority group in the state by 2030. We know that voting is a right, not a privilege; nonetheless, Texas has historically discriminated against voters of color and has continuously attempted to suppress their voting power. This is why we are building a movement of young Latinos ready to transform Texas.

8. Jolt believes that Latinos are the future of Texas and that politicians should work for us, not just for the interests of corporations of a minority that refuses to see us as equal. We deserve to have power and respect, and that means our democracy should look like us, represent us, and value our voices.

9. Jolt also works to build "Respect for Immigrant Families." Texas's diversity is its greatest strength, and as a state where one out of every six Texans is an immigrant, we wholeheartedly recognize that immigrants make this country better. The criminalization of undocumented immigrants and the demonization of

those who come to this country seeking a better future must end. Jolt is mobilizing our young Latino community to stand in support of immigrants.

Voter Registration Efforts

10. Jolt exists to support the Latino community and to encourage our communities to get out and vote in record numbers. A vital part of that mission is training community members to conduct nonpartisan voter registration in accordance with state law.

11. We conduct voter registration drives throughout the state, especially in Dallas, Harris, and Bexar Counties. Because of these drives, many thousands of eligible Texans have been registered to vote this year alone.

12. Many of our employees and volunteers have been certified as Volunteer Deputy Registrars (VDRs) in one or more counties. Under state law, only VDRs may handle voter registration forms before they are submitted to the registrar.

13. To maintain the high quality of its voter registration drives, it trains its VDRs carefully, closely monitors their work, and has several layers of quality control. We do all of our work in compliance with the letter and spirit of all laws.

14. A typical voter registration drive involves a VDR setting up outside a place with high foot traffic, often with a table, a banner, and guidance about voter registration from the counties and the Secretary of State. For example, we sometimes will set up outside Department of Public Safety locations because of the high number of people coming and going to conduct business. Although some people at DPS locations have an opportunity to register to vote, not everybody does, such

as parents taking their children for driving tests. And even for people who do register at DPS locations, Jolt provides information about how to participate in upcoming elections.

15. At voter registration events, a Jolt VDR will answer questions from passersby who are interested in learning more about voting. Jolt will typically have pamphlets providing information about voting, such as a map of polling locations and information about the times that precincts are open. The VDR will also bring blank voter registration forms.

16. If a person wants to register to vote, a VDR will explain the eligibility requirements, answer any questions, and walk them through the process of filling out a voter registration form. When the person is finished, the VDR hands the applicant a receipt. Within five days, the VDR will deposit the completed voter registration form with the county registrar.

17. The determination whether someone is legally allowed to vote is made exclusively by the Secretary of State and county registrars. A VDR simply collects the form and provides it to the appropriate government office for decision. A VDR is not allowed to determine whether someone is actually eligible to vote, and is not legally permitted under Texas law to refuse to submit a completed application to the county registrar.

18. Jolt also has a presence on college campuses, working to register college students. For example, Jolt Action has on-campus student chapters that are led by student coordinators, who register as VDRs so that they can help their

classmates register to vote. Our students are part of a network of young Latinos across Texas working to make our state a better place for everyone.

19. In addition to voter registration drives, Jolt encourages Latinos in Texas to vote through public education campaigns, leadership programming, and other measures.

20. For example, Jolt has a presence in high schools, encouraging students to register when they turn 18, and building the foundation for a lifetime of engaged citizenship. Jolt has also worked to put together the largest research study of Latino voters in Texas history.

21. Jolt's leadership programs provide training to Latino youth on public speaking, advocacy, organizing, and mobilization so that they can be effective leaders in their community. The programs also provide education on voting history and participation among Latinos in the United States.

Other Public Expression

22. Both Jolt and Jolt Action speak out on issues that matter to Latinos in Texas. Both organizations use social media, speak to the press, and send out emails to supporters.

23. Sometimes, these messages are critical of misuses of government power.

24. For example, on August 10, 2024, Jolt Action posted a video on X in response to legislation in Texas curbing the rights of LGBTQ people. The caption with the video read: "There's nothing scarier than Republican politicians grabbing

power to control us. The only way to stop them? Be a voter.

#OurFreedomsOurFutures.”

25. On August 13, 2024, Jolt Action posted a video on X fact-checking former President Donald Trump’s false claims about immigrants, including his false claim that widespread illegal voting by noncitizens undermined the results of the 2020 presidential election. Along with the video, the X post said: “The misinformation is on a different level these days & we’re here to do some (simple, easy-to-google) fact-checking from everyone’s least favorite Presidential nominee. Make sure you are registered to vote against anti-immigrant rhetoric this November! #JoltTheVote.”

26. On August 23, 2024, shortly after the Texas Attorney General raided the homes of six people affiliated with the League of United Latin American Citizens (LULAC), Jolt Action sent out an email blast to thousands of supporters titled: “URGENT: Paxton Investigation Disrupts Jolt Organizers’ Important Work.” In this email, Jolt Action accused the Attorney General of “suppress[ing] voter registration” and “attack[ing] Texans once again.” A true and accurate copy of this email is attached as Exhibit A.

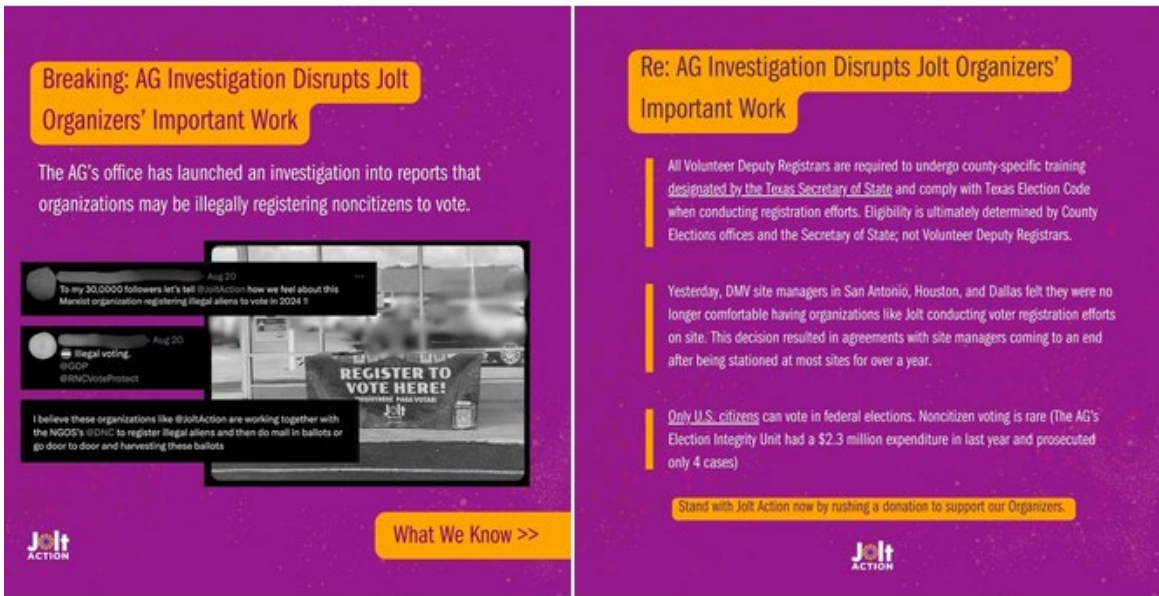
27. Also on August 23, 2024, Jolt Action made the following public post on its Facebook page, declaring “we won’t stay quiet, and we are prepared to make our voices heard to ensure voting rights aren’t infringed upon.” A true and accurate depiction of this post is below:



Jolt Action

August 23 at 1:40 PM

At Jolt Action, we won't stay quiet, and we are prepared to make our voices heard to ensure voting rights aren't infringed upon. We're committed to working through this election and beyond to continue protecting the rights of our community, ensure that every eligible Texan is registered to vote, and that they exercise that [#righttovote](#) at the ballot box! Support our organizers - <http://jolttx.org/donate>



Social Media Attack in August 2024

28. On August 20, 2024, a X user named “@hernandoarce” posted a video of someone confronting a Jolt VDR. The user wrote “we have Marxist non profit organizations like @JoltAction infiltrating Texas @TxDPS locations in San Antonio.” The user tagged our Jolt Action X account and @KenPaxtonTx, among others. The post was seen tens of thousands of times, and was reshared by more than 800 people as of the date of this declaration.

29. Jolt leadership immediately became concerned for the safety of all of its employees and VDRs, and shared safety tips on how to handle potentially threatening situations.

30. One day after this post, on August 21, 2024, the Attorney General issued a press release announcing an investigation into Texas nonprofits that conduct voter registration drives, with a focus on those that do so at DPS locations.

Request to Examine

31. Jolt Initiative received a Request to Examine (RTE), dated August 30, 2024, from the Office of the Attorney General. A true and correct copy of the Request to Examine is attached as Exhibit B.

32. The RTE was given to Jolt's former executive director on August 31, 2024, who then forwarded it to Jolt.

33. The RTE instructed Jolt Initiative to provide, by September 19, 2024, four categories of documents:

1. Each of Your volunteer deputy registrars' certificates of appointment.
2. All Documents Jolt provides to your volunteer deputy registrars Concerning the voter registration application process.
3. All Documents Jolt provides to your volunteer deputy registrars Concerning Your role in the voter registration application process.
4. Each of the completed registration receipts created pursuant to Texas Election Code § 13.040 and maintained by You.

34. The RTE further provided that failure to comply could lead the Attorney General to seek forfeiture of Jolt's registration.

Fear of Reprisal

35. Jolt leadership discussed the RTE with board members, who were shaken, upset, and frustrated that Jolt was being unfairly targeted with this demand. The board concluded that it could not comply with the RTE without

jeopardizing the safety of its VDRs and the confidence of its partners and the Latino community. If Jolt were to provide the documents requested, it would make it more difficult for Jolt to fulfill its mission of encouraging Latinos to become more politically active.

36. The RTE demands confidential information, such as the identities of all people who serve with us as VDRs. We do not publicly share the identities of all of our VDRs. Although the identities of some of Jolt Action's staff is public, there are many VDRs whose work with Jolt is not public knowledge.

37. The RTE demands the certificates of appointment for every VDR associated with Jolt. Certificates of appointment contain additional private information such as the VDR's address and date of birth. We do not publicly share this information about any of our VDRs. Our VDRs would consider our sharing their private information to be a serious breach of trust.

38. Other than submitting their voter registration forms to the appropriate county registrar, we do not publicly share names or other information about the people who we have helped register to vote.

39. If we were forced to provide confidential information about our VDRs to the Attorney General, we fear that he would target our VDRs for baseless intimidation and harassment, as he has done with others.

40. Similarly, if we were forced to disclose the identities of people who we have successfully helped register to vote, we fear that the Attorney General would try to intimidate or scare them and try to deter them from exercising their right to

vote. People who fill out a voter registration form at one of our booths are entrusting us to faithfully deposit their form with the county registrar.

41. Moreover, if we were forced to disclose voters' personally identifying information, we would be betraying the trust that we have carefully earned from the Texas Latino community. Our partners would likely not want to work with us as closely, and it would jeopardize our collaboration with other groups, including donors.

42. Although they have done nothing wrong, people associated with Jolt have every reason to fear the Attorney General's scrutiny. He may go after their friends or family members or try to interfere with their employment. Simply being forced to answer questions or having law enforcement come to your home is intimidating, when all you are trying to do is vote or help others do so.

43. One reason Jolt does its work to increase political power in the community is that many Texans fear reprisal if they are vocal on controversial matters. This concern is especially acute in the Latino community. Many Latinos have friends or family members who are undocumented, and they fear that if they draw attention to themselves, they may place their friends or family at risk. Other Latinos may be going through the process of becoming a citizen, and worry that if they criticize the government or take a controversial stand, they will jeopardize their immigration status.

44. Jolt is particularly concerned about public disclosure of personal identifying information about its employee and volunteer VDRs, as well as personal

identifying information about the voters those VDRs help to register. Such disclosure may subject those people to threats, harassing communications, or even place them at risk of violence from extremists who believe the Attorney General's false accusations that organizations like ours are helping ineligible people register to vote.

45. In fact, after the Attorney General's announcement targeting Jolt, some of our partners have been less willing to collaborate with us publicly. Despite the RTE, we continue to do our voter registration work every day. But the number of voters who our VDRs have registered has declined noticeably. If we were to provide confidential information to the Attorney General, we would struggle to have productive relationships with other voter engagement groups, and the number of voters and VDRs willing to associate with us would likely drop dramatically.

I declare under penalty of perjury that this declaration is true and correct.

Executed on September 13, 2024.

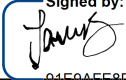
Signed by:

01E9AFE8DD004A6...
Jacqueline Bastard

Exhibit C

DECLARATION OF A.R.

I, A.R., pursuant to 28 U.S.C. § 1746, declare as follows:

1. I have reviewed Exhibit A (the “Report”) to the Attorney General’s Motion to Dismiss and Response to Plaintiff’s Request for Preliminary Injunction. Based on the information contained in the Report, including the date and Department of Public Safety (“DPS”) location described, I understand myself to be the individual Volunteer Deputy Registrar (“VDR”) discussed in it.

2. I was at the time of the Report employed by Jolt Action and Jolt Initiative (collectively, “Jolt”) as a Canvasser. I began working for Jolt in June 2024.

3. I began my work as a Jolt Canvasser in Houston, Texas. In order to become a VDR, I had to successfully complete a training and certification process with the county. The training was approximately one-hour long. I then completed a written test, took an oath in which I swore to comply with Texas registration laws, and then received certification from Harris County.

4. Before acting as a VDR on my own, I shadowed other Jolt VDRs for approximately one week in order to learn the proper protocols to ensure that I knew how to do everything in compliance with Texas law.

5. I also completed a VDR certification test in Hays County, Texas, on or around July 23, 2024.

6. On or around July 23, 2024, I obtained reciprocal certification as a VDR in Bexar County, Texas, based on my Hays County certification. I went in person to the Bexar County office, presented my Hays County certification, and took the VDR oath.

7. I am currently a certified VDR in Harris County, Hays County, and Bexar County.

8. As part of my activities helping individuals register to vote, I went to many different busy public places, including college campuses, public events, and government offices.

9. Before DPS made an announcement prohibiting voter registration outside of their offices, I at times registered voters at the Universal City DPS location described in the Report. There, I regularly encountered a variety of people, including individuals new to Texas and many members of the armed forces, as San Antonio has a strong military presence. Although some of them were there to obtain drivers licenses, the DPS staff did not usually explain to them that they could register to vote or give any information on registration and elections in Texas. Other individuals were there for services other than drivers licenses or were accompanying somebody there.

10. I had a good relationship with the Universal City DPS office, and the workers there would occasionally come out to ask questions about voter registration, election information, or to offer me water. The workers expressed to me that they appreciated my presence because I could help answer people's questions about voter registration and elections in Texas.

11. When registering voters outside DPS, I would often receive questions about the voter registration process or a person's voter registration status. Some individuals expressed hesitation about registering to vote, and I would emphasize the

positive aspects of participating and explain that they should be on the rolls in case they change their minds about voting later. There were many individuals who did not register to vote inside the office or were unsure if they were registered and wanted me to check their status or help them register.

12. In these interactions, I would also provide information about upcoming election dates and where to find polling locations, often referring people to the Bexar County election office website.

13. On August 20, 2024, an individual posted a video online, which included footage of me acting as a VDR. I am aware that there were comments made about the video and that it was portrayed as if I had somehow given misinformation about registering to vote.

14. In the video, I accurately told the individual that I had never encountered anybody trying to register to vote illegally or trying to vote illegally, which was and is true to the best of my knowledge. In our interaction, I understood the individual to be asking whether VDRs have any way of ultimately preventing an ineligible person from attempting to register to vote if they are really intent on trying to do so. I attempted to explain that, as VDRs, by law, we are merely the messengers for voter registration, and it is the county's responsibility to verify eligibility. We are not in a position to verify anybody's eligibility. Although I always explain the legal requirements for eligibility to anybody seeking to register to vote, that it is a crime to register illegally, and highlight important requirements on the form, as a VDR I ultimately have no way of knowing if somebody is providing false information—just

as there is nothing to prevent them from using the State mail-in registration form on their own to provide false information if they are intent on doing so. I was in no way expressing to the person recording the video that it was legal or advisable for an ineligible person to register, but merely that VDRs do not ultimately have a way to determine somebody's eligibility or know if they are lying.

15. As a VDR, I have a legal responsibility to turn in every completed registration form to the county. It would be a violation of the law for me to not turn in a completed form, with potential criminal penalties. The county and the state then have the duty to verify eligibility.

16. I know the Texas voter registration eligibility requirements, including that a person registering must be at least 17 years and 10 months old and turning 18 by Election Day, and a United States citizen. I always inform individuals that they must meet these requirements in order to be eligible to vote. On the registration forms that I use, I highlight in yellow highlighter the question "Are you a United States Citizen?" to make sure that the voter pays attention to this important legal requirement.

17. On the date described in the Report, I was at the Universal City DPS registering voters and providing information on registration and elections. I do not specifically recall the interaction described in the Report. Again, it was commonplace for individuals to ask me questions about the voter registration rules.

18. I typically carry a red clipboard that is attached atop a container, which opens. I keep the highlighted voter registration forms on top and place completed

forms inside the container. This is my normal practice. I need to have a way to keep blank and filled out forms organized separately and to have a surface for the individuals registering to fill out the forms. I do not have a folder or binder, but the Report may mistakenly be referring to my clipboard container as a folder or binder.

19. The VDR forms I use to register voters have my VDR information on the legally required receipt portion of the form. Therefore, I cannot just hand out these forms to somebody who asks because it would be illegal for that person to use them to register a voter. Sometimes I have standard, blank mail-in registration forms that voters can take with them, but I often run out of these forms. If someone asks for a form to take with them and I am out of mail-in forms, I would not give them one of the VDR forms with my VDR information on it because that would be illegal. Attached as Exhibit A is a copy of a sample VDR form with certain important fields highlighted to make sure the voter fills them out correctly. In addition to me explaining the legal requirements to register to vote, the fields are highlighted so that the individuals do not miss any important information or unwittingly provide false information.

20. Under Texas law, certain individuals, such as a parent, child, or spouse, can act as an agent for their child/parents/spouse to register them to vote, as long as they have permission. This information is clearly referred to on the voter registration form where it says "Signature of Applicant ***or Agent and Relationship to Applicant.***"

21. I learned this law as part of my VDR training. The training presentation I reviewed was substantially the same as the one attached to this declaration as

Exhibit B. Specifically, the presentation explains on page 21 that an agent must sign the application as “agent,” state their relationship to the applicant, and have permission to complete the form. It says clearly:

You may allow another registered voter (or anyone who has submitted a registration application) to fill out and sign an application for his/her spouse, parent or child. That person must sign the application as “agent” and state the relationship to the applicant on the application. The “agent” must have the permission of the applicant to do this.

22. Since the DPS announcement in August prohibiting voter registration outside of their offices, I have not registered any voters outside any DPS location.

23. I do not wish to be publicly identified. I worked as a Canvasser for Jolt because I believe it is important for everybody to register to vote, and in particular that there are low voter registration rates in Latino communities that need to be addressed. Unfortunately, sometimes people want to try to make this into a controversial issue, make false accusations about what we are doing, and prevent us from encouraging registration and voting. Especially in the media and on social media there have been many stories spread—I believe falsely, based on my knowledge and experience—about ineligible individuals registering to vote. Some people try to blame VDRs, who are just following the law, for this. I do not wish to be the subject of any harassment, scrutiny, or investigation and worry that I will be if my information is released, especially after seeing the comments section of the video of me described above.

24. In the coming weeks, I plan to complete the process of enlisting in the United States Air Force and start boot camp. That is another reason I do not wish to be

publicly identified at this time. Any harassment, scrutiny, or investigation that could come from being identified might distract me from this important next step in my career, in which I hope to serve our country.

25. Based on the redacted Report, I do not know if the Attorney General or anyone in his office has my complete identifying information. To the extent they do not, I do not want my information released to them by an employer. The Report mistakenly claims that I did something illegal even though I did not do anything wrong and referred correctly to Texas laws as shown in the Secretary of State's own VDR training materials. I do not want myself or any of my colleagues to be the subject of any sort of unwarranted investigation. I would be less likely to work for or volunteer for an organization if I knew that a law enforcement agency was requiring them to turn over information on volunteers, voters, and employees, when there was no legitimate reason for requiring them to do so.

I declare under penalty of perjury that this declaration is true and correct.

Executed on October 10, 2024.

/s/A.R.
A.R.

Signed copy maintained by Plaintiff's counsel.

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Pauline Sisson on behalf of Ian Bergstrom

Bar No. 24145952

pauline.sisson@oag.texas.gov

Envelope ID: 107237465

Filing Code Description: Petition

Filing Description: 20251023 State's Mtn for Leave to File Quo Warranto

Petition w Ex A

Status as of 10/24/2025 9:09 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
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Rob Farquharson		rob.farquharson@oag.texas.gov	10/23/2025 6:54:41 PM	SENT
Johnathan Stone		johnathan.stone@oag.texas.gov	10/23/2025 6:54:41 PM	SENT
Pauline Sisson		pauline.sisson@oag.texas.gov	10/23/2025 6:54:41 PM	SENT
Emily Samuels		emily.samuels@oag.texas.gov	10/23/2025 6:54:41 PM	SENT

DECLARATION OF A.R.

I, A.R., pursuant to 28 U.S.C. § 1746, declare as follows:

1. I have reviewed Exhibit A (the “Report”) to the Attorney General’s Motion to Dismiss and Response to Plaintiff’s Request for Preliminary Injunction. Based on the information contained in the Report, including the date and Department of Public Safety (“DPS”) location described, I understand myself to be the individual Volunteer Deputy Registrar (“VDR”) discussed in it.

2. I was at the time of the Report employed by Jolt Action and Jolt Initiative (collectively, “Jolt”) as a Canvasser. I began working for Jolt in June 2024.

3. I began my work as a Jolt Canvasser in Houston, Texas. In order to become a VDR, I had to successfully complete a training and certification process with the county. The training was approximately one-hour long. I then completed a written test, took an oath in which I swore to comply with Texas registration laws, and then received certification from Harris County.

4. Before acting as a VDR on my own, I shadowed other Jolt VDRs for approximately one week in order to learn the proper protocols to ensure that I knew how to do everything in compliance with Texas law.

5. I also completed a VDR certification test in Hays County, Texas, on or around July 23, 2024.

6. On or around July 23, 2024, I obtained reciprocal certification as a VDR in Bexar County, Texas, based on my Hays County certification. I went in person to the Bexar County office, presented my Hays County certification, and took the VDR oath.

7. I am currently a certified VDR in Harris County, Hays County, and Bexar County.

8. As part of my activities helping individuals register to vote, I went to many different busy public places, including college campuses, public events, and government offices.

9. Before DPS made an announcement prohibiting voter registration outside of their offices, I at times registered voters at the Universal City DPS location described in the Report. There, I regularly encountered a variety of people, including individuals new to Texas and many members of the armed forces, as San Antonio has a strong military presence. Although some of them were there to obtain drivers licenses, the DPS staff did not usually explain to them that they could register to vote or give any information on registration and elections in Texas. Other individuals were there for services other than drivers licenses or were accompanying somebody there.

10. I had a good relationship with the Universal City DPS office, and the workers there would occasionally come out to ask questions about voter registration, election information, or to offer me water. The workers expressed to me that they appreciated my presence because I could help answer people's questions about voter registration and elections in Texas.

11. When registering voters outside DPS, I would often receive questions about the voter registration process or a person's voter registration status. Some individuals expressed hesitation about registering to vote, and I would emphasize the

positive aspects of participating and explain that they should be on the rolls in case they change their minds about voting later. There were many individuals who did not register to vote inside the office or were unsure if they were registered and wanted me to check their status or help them register.

12. In these interactions, I would also provide information about upcoming election dates and where to find polling locations, often referring people to the Bexar County election office website.

13. On August 20, 2024, an individual posted a video online, which included footage of me acting as a VDR. I am aware that there were comments made about the video and that it was portrayed as if I had somehow given misinformation about registering to vote.

14. In the video, I accurately told the individual that I had never encountered anybody trying to register to vote illegally or trying to vote illegally, which was and is true to the best of my knowledge. In our interaction, I understood the individual to be asking whether VDRs have any way of ultimately preventing an ineligible person from attempting to register to vote if they are really intent on trying to do so. I attempted to explain that, as VDRs, by law, we are merely the messengers for voter registration, and it is the county's responsibility to verify eligibility. We are not in a position to verify anybody's eligibility. Although I always explain the legal requirements for eligibility to anybody seeking to register to vote, that it is a crime to register illegally, and highlight important requirements on the form, as a VDR I ultimately have no way of knowing if somebody is providing false information—just

as there is nothing to prevent them from using the State mail-in registration form on their own to provide false information if they are intent on doing so. I was in no way expressing to the person recording the video that it was legal or advisable for an ineligible person to register, but merely that VDRs do not ultimately have a way to determine somebody's eligibility or know if they are lying.

15. As a VDR, I have a legal responsibility to turn in every completed registration form to the county. It would be a violation of the law for me to not turn in a completed form, with potential criminal penalties. The county and the state then have the duty to verify eligibility.

16. I know the Texas voter registration eligibility requirements, including that a person registering must be at least 17 years and 10 months old and turning 18 by Election Day, and a United States citizen. I always inform individuals that they must meet these requirements in order to be eligible to vote. On the registration forms that I use, I highlight in yellow highlighter the question "Are you a United States Citizen?" to make sure that the voter pays attention to this important legal requirement.

17. On the date described in the Report, I was at the Universal City DPS registering voters and providing information on registration and elections. I do not specifically recall the interaction described in the Report. Again, it was commonplace for individuals to ask me questions about the voter registration rules.

18. I typically carry a red clipboard that is attached atop a container, which opens. I keep the highlighted voter registration forms on top and place completed

forms inside the container. This is my normal practice. I need to have a way to keep blank and filled out forms organized separately and to have a surface for the individuals registering to fill out the forms. I do not have a folder or binder, but the Report may mistakenly be referring to my clipboard container as a folder or binder.

19. The VDR forms I use to register voters have my VDR information on the legally required receipt portion of the form. Therefore, I cannot just hand out these forms to somebody who asks because it would be illegal for that person to use them to register a voter. Sometimes I have standard, blank mail-in registration forms that voters can take with them, but I often run out of these forms. If someone asks for a form to take with them and I am out of mail-in forms, I would not give them one of the VDR forms with my VDR information on it because that would be illegal. Attached as Exhibit A is a copy of a sample VDR form with certain important fields highlighted to make sure the voter fills them out correctly. In addition to me explaining the legal requirements to register to vote, the fields are highlighted so that the individuals do not miss any important information or unwittingly provide false information.

20. Under Texas law, certain individuals, such as a parent, child, or spouse, can act as an agent for their child/parents/spouse to register them to vote, as long as they have permission. This information is clearly referred to on the voter registration form where it says “Signature of Applicant ***or Agent and Relationship to Applicant.***”

21. I learned this law as part of my VDR training. The training presentation I reviewed was substantially the same as the one attached to this declaration as

Exhibit B. Specifically, the presentation explains on page 21 that an agent must sign the application as “agent,” state their relationship to the applicant, and have permission to complete the form. It says clearly:

You may allow another registered voter (or anyone who has submitted a registration application) to fill out and sign an application for his/her spouse, parent or child. That person must sign the application as “agent” and state the relationship to the applicant on the application. The “agent” must have the permission of the applicant to do this.

22. Since the DPS announcement in August prohibiting voter registration outside of their offices, I have not registered any voters outside any DPS location.

23. I do not wish to be publicly identified. I worked as a Canvasser for Jolt because I believe it is important for everybody to register to vote, and in particular that there are low voter registration rates in Latino communities that need to be addressed. Unfortunately, sometimes people want to try to make this into a controversial issue, make false accusations about what we are doing, and prevent us from encouraging registration and voting. Especially in the media and on social media there have been many stories spread—I believe falsely, based on my knowledge and experience—about ineligible individuals registering to vote. Some people try to blame VDRs, who are just following the law, for this. I do not wish to be the subject of any harassment, scrutiny, or investigation and worry that I will be if my information is released, especially after seeing the comments section of the video of me described above.

24. In the coming weeks, I plan to complete the process of enlisting in the United States Air Force and start boot camp. That is another reason I do not wish to be

publicly identified at this time. Any harassment, scrutiny, or investigation that could come from being identified might distract me from this important next step in my career, in which I hope to serve our country.

25. Based on the redacted Report, I do not know if the Attorney General or anyone in his office has my complete identifying information. To the extent they do not, I do not want my information released to them by an employer. The Report mistakenly claims that I did something illegal even though I did not do anything wrong and referred correctly to Texas laws as shown in the Secretary of State's own VDR training materials. I do not want myself or any of my colleagues to be the subject of any sort of unwarranted investigation. I would be less likely to work for or volunteer for an organization if I knew that a law enforcement agency was requiring them to turn over information on volunteers, voters, and employees, when there was no legitimate reason for requiring them to do so.

I declare under penalty of perjury that this declaration is true and correct.

Executed on October 10, 2024.

/s/A.R.
A.R.

Signed copy maintained by Plaintiff's counsel.

EXHIBIT A

TO A.R. DECLARATION

Texas Voter Registration Application

Prescribed by the Office of the Secretary of State

For Official Use Only

Please complete sections by printing LEGIBLY. If you have any questions about how to fill out this application, please call your local voter registrar. Please visit the Texas Secretary of State website, www.sos.state.tx.us, and for additional election information visit www.votetexas.gov. Este formulario está disponible en español. Favor de llamar a su registrador de votantes local para conseguir una versión en español.

Qualifications

- You must register to vote in the county in which you reside.
- You must be a citizen of the United States.
- You must be at least 17 years and 10 months old to register, and you must be 18 years of age by Election Day.
- You must not be finally convicted of a felony, or if you are a felon, you must have completed all of your punishment, including any term of incarceration, parole, supervision, period of probation, or you must have received a pardon.
- You must not have been determined by a final judgment of a court exercising probate jurisdiction to be totally mentally incapacitated or partially mentally incapacitated without the right to vote.

1 THESE QUESTIONS MUST BE COMPLETED BEFORE PROCEEDING (Check one)

- ☒ New Application ☐ Change of Address, Name, or Other Information ☐ Request for a Replacement Card

Are you a United States Citizen? ☐ Yes ☐ No Will you be 18 years of age on or before election day? ☐ Yes ☐ No

If you checked 'No' in response to either of the above, do not complete this form.

Are you interested in serving as an election worker? ☐ Yes ☐ No

2 Last Name Include Suffix if any (Jr, Sr, III)	First Name	Middle Name (if any)	Former Name (if any)
3 Residence Address: Street Address and Apartment Number. If none, describe where you live. (Do not include P.O. Box, Rural Rt. or Business Address)		City	TEXAS
		County	Zip Code
4 Mailing Address: Street Address and Apartment Number. (If mail cannot be delivered to your residence address.)		City	State
			Zip Code
5 City and County of Former Residence in Texas			

6 Date of Birth: (mm/dd/yyyy)	7 Gender (Optional) ☐ Male ☐ Female	8 Telephone Number (Optional) Include Area Code () - - - - -
-------------------------------	---	--

9 Texas Driver's License No. or Texas Personal I.D. No.
(Issued by the Department of Public Safety)

XXXX-XX-XXXX

If no Texas Driver's License or Personal Identification, give last 4 digits of your Social Security Number

XXX-XX-XXXX

☐ I have not been issued a Texas Driver's License/Personal Identification Number or Social Security Number.

10 I understand that giving false information to procure a voter registration is perjury, and a crime under state and federal law. Conviction of this crime may result in imprisonment up to one year in jail, a fine up to \$4,000, or both. Please read all three statements to affirm before signing.

- I am a resident of this county and a U.S. citizen;
- I have not been finally convicted of a felony, or if a felon, I have completed all of my punishment including any term of incarceration, parole, supervision, period of probation, or I have been pardoned; and
- I have not been determined by a final judgment of a court exercising probate jurisdiction to be totally mentally incapacitated or partially mentally incapacitated without the right to vote.

X
Signature of Applicant or Agent and Relationship to Applicant or Printed Name of Applicant if Signed by Witness and Date.

Date: _____

FOR VOLUNTEER DEPUTY REGISTRAR USE ONLY

Deputy Number	Application must be delivered to Voter Registrar no later than 5 days after receipt
Signature of Volunteer Deputy Registrar	Date

REGISTRATION RECEIPT

Name of Applicant/Applicant's Agent (if applicable)	Receipt No.:
Name of Volunteer Deputy Registrar	Deputy No.:
Signature of Volunteer Deputy Registrar	

Exhibit B
to A. R. Declaration

TRAINING FOR TEXAS VOLUNTEER DEPUTY REGISTRARS



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BEFORE GETTING STARTED



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- A person may not receive another person's registration application until satisfactorily completing training developed or approved by the Secretary of State and is appointed a volunteer deputy registrar.



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- At the time of appointment, the county voter registrar will advise the volunteer deputy registrar of any county-specific procedures for processing voter registration applications and that the only requirements for voter registration are those prescribed by state law or by the Secretary of State.



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QUALIFICATIONS



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A Volunteer Deputy Registrar must:

- be 18 years of age or older
- be a United States citizen
- not have been determined by a final judgment of a court exercising probate jurisdiction to be:
 1. totally mentally incapacitated; or
 2. partially mentally incapacitated without the right to vote
- never have been convicted of failing to deliver a voter registration application to a voter registrar
- not have been finally convicted of a felony, or, if convicted, must have
 1. fully discharged the sentence, including any term of incarceration, parole, or supervision, or completed a period of probation ordered by any court; or
 2. been pardoned or otherwise released from the resulting disability to vote



- not have been finally convicted of identity theft under Section 32.51 of the Texas Penal Code
- be a Texas resident

NOTE: A county voter registrar may not reappoint a person whose appointment as a volunteer deputy registrar is terminated either for a final conviction under (1) Section 13.043, Texas Election Code, relating to delivery of completed registration applications or (2) Section 13.008, Texas Election Code, relating to performance-based compensation for volunteer deputy registrars.



- NOTE: Pursuant to Section 13.031(d)(3) of the Texas Election Code, to be eligible for appointment as a volunteer deputy registrar, a person must meet the requirements to be a qualified voter under Section 11.002 of the Code, except that the person **is not** required to be a registered voter.



LENGTH OF APPOINTMENT



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- A person who meets the qualifications may be appointed a volunteer deputy registrar at any time.
- All appointments expire on December 31st of every even-numbered year.
- A person who has previously taken the volunteer deputy registrar examination and received a certificate of appointment in one county is not required to take the examination again in another county. The person should submit a Request for Appointment as a VDR with the new county. The voter registrar in the new county will appoint the person as a VDR and advise of any county-specific procedures.



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Your appointment as a volunteer deputy registrar **MAY** be terminated by the appointing authority if it is determined that you:

- failed to properly review a voter registration application;
- intentionally destroyed or physically altered a registration application; or
- engaged in any other activity that conflicts with your responsibilities as a volunteer deputy registrar.



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Your appointment as a volunteer deputy registrar **WILL** be terminated by the county voter registrar if you are:

- finally convicted of an offense under the law relating to performance-based compensation for voter registration, Section 13.008, Texas Election Code; or
- finally convicted of an offense under the law relating to a failure to deliver a completed voter registration application to the county voter registrar, Section 13.043, Texas Election Code.



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ROLE OF A VOLUNTEER DEPUTY REGISTRAR



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SUPPLIES NEEDED



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- Certificate of Appointment*
- Texas Volunteer Deputy Registrar Guide and any other handbook provided by your appointing authority*
- Voter Registration Applications*
- Receipt Book*
- Pens

**All election materials issued to a volunteer deputy registrar, including the Certificate of Appointment, receipt books, receipts, applications and other forms in the volunteer deputy registrar's possession, must be returned or accounted for upon termination of appointment, not later than the second day after the volunteer deputy registrar receives the termination notice.*



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DISTRIBUTING AND ACCEPTING APPLICATIONS



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A volunteer deputy registrar assists the county voter registrar who appointed him or her to encourage voter registration. A volunteer deputy registrar:

- may **distribute** voter registration applications to anyone who requests one.
- may **distribute and accept** a completed voter registration application from any resident of the county who is:
 - a United States citizen;
 - a resident of the county;
 - at least 17 years and 10 months of age;
 - not a convicted felon (unless the person's sentence has been completed, including probation or parole or the person has been pardoned or otherwise released from the resulting disability to vote);
 - not a person determined by a final judgment of a court exercising probate jurisdiction to be (1) totally mentally incapacitated; or (2) partially mentally incapacitated without the right to vote.



- may **distribute and accept** a completed voter registration application from any resident of the county who wishes to change or correct information on his/her voter registration certificate (such as name or address).

Your county voter registrar should provide you with applications containing the county return address. If your county voter registrar does not have enough applications to provide to you, you may print blank applications for volunteer deputy registrars from the Secretary of State's website. These applications should only be distributed to applicants residing in the county. Should you receive generic applications containing the Secretary of State's return address, you can distribute to anyone residing in any county; however, you can only accept applications from those registering within the county in which you were appointed.



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ASSISTING APPLICANTS



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- You may assist any resident of the county in completing a voter registration application, if he/she cannot read, or has a physical disability.
- If an applicant cannot sign his/her name on the application, the applicant may make a mark on the signature line. Print the name of the applicant beside the mark. If the applicant cannot make a mark, please state that fact on the application and print the applicant's name. Sign and print your name, and provide your residence address as the witness.
- You may allow another registered voter (or anyone who has submitted a registration application) to fill out and sign an application for his/her spouse, parent or child. That person must sign the application as “agent” and state the relationship to the applicant on the application. The “agent” must have the permission of the applicant to do this.



REVIEWING THE APPLICATIONS



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- Each voter registration application should be reviewed in the presence of the applicant.
- If the voter registration application does not contain all the required information, including the required signature, the volunteer deputy registrar shall return the application to the applicant for completion and resubmission.



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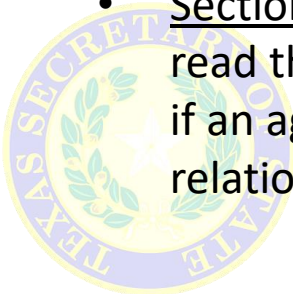
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A voter registration application you accept from any resident of the county should include the following:

- Section 1: Applicant must select why they are submitting the application (new application, change of current information, or request for replacement). Applicant must also answer citizenship and age questions;
- Section 2: Full name, including any middle, maiden, or former name;
- Section 3: Residence address must be a street address or a description of the location of the residence;
- Section 4: Valid mailing address, if mail can't be delivered to the residence address;
- Section 5: City and County of Former Residence in Texas;
- Section 6: Date of birth, including month, day, and year;
- Section 9: Texas Driver's License No., Texas Personal I.D. No., or last 4 digits of social security number. If the applicant hasn't been issued any of these items, he or she must check the box in this section affirming this statement; and
- Section 10: Signature of applicant and date of signing. Be sure the applicant has read the statements that he/she is signing regarding qualifications to register and if an agent is registering for an applicant, be sure the agent provides his/her relationship to the applicant.



A volunteer deputy registrar **MAY NOT**:

- determine if the applicant is actually qualified to register to vote; or
- make the applicant provide his/her gender or telephone number.



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Please complete sections by printing LEGIBLY. If you have any questions about how to fill out this application, please call your local voter registrar. Please visit the Texas Secretary of State website, www.sos.state.tx.us, and for additional election information visit www.votetexas.gov. Este formulario está disponible en español. Favor de llamar a su registrador de votantes local para conseguir una versión en español.

Qualifications

- You must register to vote in the county in which you reside.
- You must be a citizen of the United States.
- You must be at least 17 years and 10 months old to register, and you must be 18 years of age by Election Day.
- You must not be finally convicted of a felony, or if you are a felon, you must have completed all of your punishment, including any term of incarceration, parole, supervision, period of probation, or you must have received a pardon.
- You must not have been determined by a final judgment of a court exercising probate jurisdiction to be totally mentally incapacitated or partially mentally incapacitated without the right to vote.

1 THESE QUESTIONS MUST BE COMPLETED BEFORE PROCEEDING (Check one)

☒ New Application ☐ Change of Address, Name, or Other Information ☐ Request for a Replacement Card

Are you a United States Citizen? ☒ Yes ☐ No Will you be 18 years of age on or before election day? ☒ Yes ☐ No

If you checked 'No' in response to either of the above, do not complete this form.

Are you interested in serving as an election worker? ☐ Yes ☒ No

2 Last Name Include Suffix if any (Jr, Sr, III) First Name Middle Name (if any) Former Name (if any)
Smith Jane Doe

3 Residence Address: Street Address and Apartment Number. If none, describe where you live. (Do not include P.O. Box, Rural Rt. or Business Address) City State
123 This way Lane Here TEXAS

County Zip Code
There 77777

4 Mailing Address: Street Address and Apartment Number. (If mail cannot be delivered to your residence address.) City State Zip Code

5 City and County of Former Residence in Texas

6 Date of Birth: (mm/dd/yyyy) 7 Gender (Optional) 8 Telephone Number (Optional) Include Area Code
12/12/1912 ☐ Male ☐ Female *() - -*

9 Texas Driver's License No. or Texas Personal I.D. No. (Issued by the Department of Public Safety) If no Texas Driver's License or Personal Identification, give last 4 digits of your Social Security Number
01234567 XXX-XX- -

☐ I have not been issued a Texas Driver's License/Personal Identification Number or Social Security Number.

10 I understand that giving false information to procure a voter registration is perjury, and a crime under state and federal law. Conviction of this crime may result in imprisonment up to one year in jail, a fine up to \$4,000, or both. Please read all three statements to affirm before signing.

- I am a resident of this county and a U.S. citizen;
- I have not been finally convicted of a felony, or if a felon, I have completed all of my punishment including any term of incarceration, parole, supervision, period of probation, or I have been pardoned; and
- I have not been determined by a final judgment of a court exercising probate jurisdiction to be totally mentally incapacitated or partially mentally incapacitated without the right to vote.

X *Jane Smith*

Signature of Applicant or Agent and Relationship to Applicant or Printed Name of Applicant if Signed by Witness and Date.

Date: *07/01/2015*

FOR VOLUNTEER DEPUTY REGISTRAR USE ONLY

Deputy Number Application must be delivered to Voter Registrar no later than 5 days after receipt
Signature of Volunteer Deputy Registrar Date

REGISTRATION RECEIPT

Name of Applicant/Applicant's Agent (if applicable) Receipt No.:
Name of Volunteer Deputy Registrar Deputy No.:
Signature of Volunteer Deputy Registrar Date:

REQUIRED

OPTIONAL

MUST BE
SIGNED AND DATED

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REGISTRATION RECEIPT



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For each completed voter registration application you receive, you must:

- prepare a receipt in duplicate
- sign the receipt and give the original to the applicant



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You should not keep copies of the completed voter registration applications because these documents contain information that is confidential by law.



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DELIVERY OF APPLICATIONS AND RECEIPTS



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- You must deliver completed registration applications and receipts in person to the county voter registrar who appointed you no later than 5:00 p.m. of the 5th day after the date you receive them.
- Alternatively, you may deliver completed registration applications and receipts to the county voter registrar through another volunteer deputy registrar appointed by the county voter registrar no later than 5:00 p.m. on the 5th day after the date you receive them.
- You **MAY NOT** deliver the application and receipts by mail.



NOTE:

To be eligible to vote, a person must be registered 30 days before Election Day. Pursuant to Section 13.042(c) of the Election Code, when you receive a completed application after the 34th day before the date of an election and on or before the last day for a person to timely submit a registration application for that election as provided by Section 13.143 of the Code, you **MUST** deliver the application to the county voter registrar **no later** than 5:00 p.m. of the next regular business day after the date to timely submit a registration application for that election as provided by Section 13.143 of the Code.



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- FAILURE TO DELIVER AN APPLICATION IN A TIMELY MANNER IS A **CRIMINAL OFFENSE**.



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VOTER REGISTRATION

(INFORMATION THAT APPLICANTS MAY WISH TO KNOW)



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APPLICANT ELIGIBILITY REQUIREMENTS



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To be eligible to register to vote a person must:

- be at least 17 years and 10 months of age;
- be a United States citizen;
- be a resident of the county where registering;
- not have been determined by a final judgment of a court exercising probate jurisdiction to be
 - (1) totally mentally incapacitated; or
 - (2) partially mentally incapacitated without the right to vote
- not have been finally convicted of a felony or, if so convicted, must have:
 - (1) fully discharged the person's sentence, including any incarceration, parole, or supervision, or completed a period of probation ordered by any court; or
 - (2) been pardoned or otherwise released from the resulting disability to vote



VOTER NAME CHANGES



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If a voter's name changes, his/her voter registration can be updated by:

- making the change on the back of his/her voter registration certificate and mailing it to the county voter registrar;
- submitting a new application form to the voter registrar and checking the box for “change”;
- writing a letter to the voter registrar explaining the name change; or
- updating information on their voter registration record through the Texas.gov online portal



VOTER ADDRESS CHANGES



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If the voter moves, his/her voter registration can be updated by:

- making the change on the back of the voter registration certificate and mailing it to the county voter registrar;
- submitting a new application form to the voter registrar and checking the box for “change”;
- writing a letter to the voter registrar explaining the change of address; or
- updating information on their voter registration record through the Texas.gov online portal



EFFECTIVE DATE OF REGISTRATION



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- The applicant can vote as soon as the 30th day after submitting the application. This 30-day period starts when the volunteer deputy registrar receives the application form.
- If the applicant is under 18, the registration will become effective on the 30th day after the voter registrar receives the application or on the applicant's 18th birthday, whichever comes later.



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PERIOD OF EFFECTIVENESS



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Voter registration will be automatically renewed every even-numbered year unless:

- the voter moves to another address;
- the voter is convicted of a felony and has not completed the sentence, probation, or parole or been pardoned or otherwise released from the resulting disability to vote; or
- the voter has been determined by a final judgment of a court exercising probate jurisdiction to be totally mentally incapacitated or partially mentally incapacitated without the right to vote



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UPCOMING ELECTIONS



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- Ask your county voter registrar about upcoming elections and deadlines to register to vote.
- For general voting information, please visit www.votetexas.gov.

**Thank you for your service as a
Texas Volunteer Deputy Registrar!**



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Elections Division

P.O. Box 12060

Austin, Texas 78711-2060

512.463.5650 or

1.800.252.VOTE (8683)

Fax 512.475.2811

TTY 7.1.1

www.sos.state.tx.us

www.votetexas.gov

elections@sos.texas.gov



EXHIBIT 1

**TO THE MOTION FOR
A PRELIMINARY
INJUNCTION**



hernando arce
@hernandoarce

!! Investigative Report we have Marxist non profit organizations like @JoltAction infiltrating Texas @TxDPS locations in San Antonio.

I approached the man sitting behind the table and asked him if any of the 20 million illegal aliens that have invaded our country in the past 3 1/2 years can register to possibly vote in the 2024 elections.

Listen very, very carefully how he answered my questions. He was coached on the legalities of this serious question.

"Can an illegal alien vote?"
"I guess they could" WTF

This is happening all across country. Follow my work as I also exposed Obamacare healthcare providers registering illegal aliens for these and other city and state programs.

Share this post with your favorite tags

#VoterFraud

#voterinterference

@SouthwestKey

@CsthCharitiesSA

@unitedwaysatx

@CCharitiesrgv

@diocesewesttx

@corazonsatx

@travisparksatx

@satodaycatholic

@texasiwc

@Starshuttleinc

@safoodbank

@KenPaxtonTX

@GovAbbott

@Ron_Nirenberg

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EXHIBIT 2

**TO THE MOTION FOR
A PRELIMINARY
INJUNCTION**



Maria Bartiromo ✓

@MariaBartiromo

...

From a friend ...

Friend of mine's wife had to take her 16 yr old son to the DMV this week for a new license. Couldn't get an online appointment(all full) so went in person and had to go to 3 DMV's to get something done. First DMV was in Weatherford. Had a massive line of immigrants getting licenses and had a tent and table outside the front door of the DMV registering them to vote! Second one was in Fort Worth with same lines and same Dems out front. Third one was in North Fort Worth had no lines but had same voter registration drive.

9:56 AM · Aug 18, 2024 · **2.3M** Views

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

JOLT INITIATIVE, INC.,

Plaintiff,

v.

KEN PAXTON, in his individual official
capacity as Attorney General of Texas,

Defendant.

Case No.: 1:25-001808

[PROPOSED] PRELIMINARY INJUNCTION

On this date, the Court considered Plaintiff Jolt Initiative's ("Jolt")'s Motion for a Preliminary Injunction against Defendant Ken Paxton, and it clearly appearing from the specific facts set forth in the Motion and supporting documents, that:

1. Jolt has demonstrated a substantial likelihood that it will succeed on the merits of at least one of its claims;
2. Jolt will suffer immediate and irreparable harm if this injunction is not entered;
3. Greater injury will be inflicted upon Jolt by the denial of injunctive relief than would be inflicted upon Defendant by granting such relief; and
4. Such injunctive relief will serve the public interest.

IT IS THEREFORE ORDERED AND DECREED THAT:

1. Jolt's Motion for a Preliminary Injunction is GRANTED;
2. Defendant and his employees, agents, servants, officers, attorneys, and other persons

in concert with Defendant, are ENJOINED from pursuing quo warranto relief against Jolt in retaliation for Jolt's First Amendment activities; and

3. The Court determines that because the Defendant faces no risk of financial harm and the public interest is at stake it will WAIVE any requirement that Jolt submit security. *See* Fed. R. Civ. P. 65(c).

SIGNED and ISSUED on _____, 2025.

UNITED STATES DISTRICT JUDGE