

IN THE CIRCUIT COURT OF MADISON COUNTY

HARRIS, ANGELIQUE
Plaintiff

V.

STATE OF ALABAMA,
Defendant

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Case No. CV-2020-000098.00

STIPULATIONS FOR DISMISSAL

Pursuant to Ala. St. R.C.P. 41(a)(1)(ii), Plaintiff ANGELIQUE HARRIS (“Plaintiff”), by counsel, and Defendant STATE OF ALABAMA (“Defendant”), by counsel, hereby stipulate and agree to the following:

1. The Alabama Constitution § 182 provides that a person convicted of a “crime of moral turpitude” shall be disqualified from registering and voting.
2. The Felony Voter Disqualification Act, Ala. Code § 17-3- 30.1 (2017) (H.B. 282), created a “comprehensive list” of “felonies involving moral turpitude” that disqualify a person from voting. It provides a list of Alabama state-level convictions, which are “the only felonies for which a person, upon conviction, may be disqualified from voting,” and adds any federal or out-of-state convictions, “which, if committed in this state, would constitute one of the offenses listed in this subsection.” Ala. Code § 17-3-30.1(c)(48).
3. Plaintiff Angelique Harris was convicted of two felonies in the United States District Court for the Northern District of Alabama under 18 U.S.C. § 641, 642 and 18 U.S.C § 1957.
4. Ms. Harris believes that her felony convictions are not disqualifying under the Felony Voter Disqualification Act and that she is eligible to register and vote under the Act and the Alabama Constitution.
5. The Madison County Board of Registrars has twice denied voter registration applications from Ms. Harris since the implementation of the Felony Voter Disqualification Act.
6. The Madison County Board of Registrars provided a written explanation regarding their decision to deny Ms. Harris’s registration application on August 27, 2020, citing only “Disqualifying Felony Conviction” and has provided documents in response to a request for all records relevant to and documents accessed in their denial of Ms. Harris’s registration applications.
7. The documents consulted by the Madison County Board of Registrars establish that Ms. Harris was convicted of crimes under 8 U.S.C. § 641, 642 and 18 U.S.C § 1957. These documents alone do not establish that Ms. Harris has been disqualified from voting by reason of her felony convictions.
8. The Madison County Board of Registrars decision to deny Ms. Harris’s voter registration based on these records and documents alone and was thus erroneous.



9. After nearly two years of proceedings, the Madison County District Attorney's office has been unable to procure evidence that might refute Ms. Harris's assertion that she is eligible to register and vote. The plea paperwork for Ms. Harris's prior convictions has been sealed by the United States District Court for the Northern District of Alabama.
10. Ms. Harris maintains that these documents are not relevant to the question of whether convictions under 8 U.S.C. § 641, 642 and 18 U.S.C § 1957 are disqualifying under the Felony Voter Disqualification Act.
11. The Madison County District Attorney's Office has advised the Madison County Board of Registrars to accept and process Ms. Harris's voter registration application, which they have done.
12. Ms. Harris is now a registered voter in Madison County, Alabama and plans to vote in this upcoming election and future elections.
13. This action shall be dismissed without prejudice as to all claims asserted by Plaintiff against Defendant.


Respectfully submitted this 28 day of October, 2022.

Blair Bowie

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On behalf of Defendant State of Alabama