**CARRERA DE ABOGACÍA**

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# Supreme Court allows Texas to use controversial voter-ID law

By Robert Barnes

The Supreme Court's order that Texas can proceed with its strict voter-ID law in next month's election ended what is likely to be just the first round in a legal battle over election-law changes made by Republican-led legislatures around the country.

In an order released just after 5 a.m. Saturday, the court said Texas could use a photo-ID law that has been described as the toughest in the nation. A district judge had declared after hearing testimony about the law that it was unconstitutional, and would keep hundreds of thousands of voters from casting ballots and disproportionately harm African Americans and Hispanics.

The Supreme Court's unsigned order did not address the merits of the law, nor did it supply reasoning for the decision to allow it to be enforced.

The court has been called upon to make emergency decisions about laws in four states, including Texas, in recent weeks, and in each case has decided against intervening in a state's plan for conducting elections so close to the start of voting.

In the Texas case, it was impossible to discern how each justice voted, although Justice Ruth Bader Ginsburg issued a stern dissent, which was joined by Justices Sonia Sotomayor and Elena Kagan.

Ginsburg leaned heavily on the findings of U.S. District Judge Nelva Gonzales Ramos, and said both the appeals court and her colleagues should have deferred to the trial judge rather than allow a potentially unconstitutional law to be used simply because the election is at hand. Early voting in Texas begins Monday.

"The greatest threat to public confidence in elections . . . is the prospect of enforcing a purposefully discriminatory law, one that likely imposes an unconstitutional poll tax and risks denying the right to vote to hundreds of thousands of eligible voters," Ginsburg wrote.

She said a panel of the U.S. Court of Appeals for the 5th Circuit had shirked its duty, since Ramos had agreed with the challengers that the law could keep an estimated 600,000 registered voters from casting ballots. Texas disputes the finding.

U.S. Attorney General Eric H. Holder Jr., who had challenged the law, called the order a "major step backward."

"It is true we are close to an election, but the outcome here that would be least confusing to voters is the one that allowed the most people to vote lawfully," Holder said in a statement.

Officials in Texas said they were pleased by the court's decision.

"The state will continue to defend the voter ID law and remains confident that the district court's misguided ruling will be overturned on the merits," said a statement from Lauren Bean, deputy communications director for Texas Attorney General Greg Abbott, who is also the

Republican candidate for governor. “The U.S. Supreme Court has already ruled that voter ID laws are a legal and sensible way to protect the integrity of elections.”

The Texas law, called SB 14, requires the state’s estimated 13.6 million registered voters to show one of seven kinds of photo identification to cast a ballot.

The state says the law will guard against voter fraud and protect public confidence in elections. But civil rights groups and the Justice Department said the state’s decisions about what kinds of identification will suffice — permits to carry concealed handguns qualify, for instance, while college IDs do not — are meant to suppress certain types of voters.

Ramos agreed with the challengers that black and Hispanic voters are more likely to lack the specific kinds of identification that Texas requires and would have more trouble than white voters in securing them.

Ginsburg noted that those without proper ID may obtain an “election identification certificate” from the Texas Department of Public Safety, but more than 400,000 eligible voters face round-trip travel times of three hours or more to the nearest office.

For those and other reasons, the Texas law originally was blocked under Section 5 of the federal Voting Rights Act, which required states and localities with a history of discrimination to have election-law changes precleared by federal authorities.

But after the Supreme Court in 2013 effectively struck down that requirement, Texas began using the law in nonfederal elections and told the court that it has been implemented in state elections without the dire consequences the challengers predicted.

Texas said the Supreme Court in 2008 validated the use of photo IDs in a case involving an Indiana law. And in his filing with the court, Abbott denied that the state’s solidly Republican leadership had ulterior motives.

“The legislature enacted SB 14 because voter identification laws are popular (as evidenced by their enactment in numerous states) and because they have been specifically approved by this court as a means to deter and detect fraud and improve public confidence in the election process,” Abbott wrote.

“A legislature is not racist for enacting a voting requirement that the Supreme Court has found to serve legitimate state interests — even if that requirement is alleged to have a disparate impact on racial minorities.”

In the past few weeks, the court has ruled on a number of emergency challenges to election laws rewritten by state legislatures and scheduled to be implemented in next month’s voting.

The court allowed Ohio to reduce the number of days early voting is offered and agreed that North Carolina could end same-day voter registration. But it blocked a new voter-ID law in Wisconsin, where early voting had already begun.

None of the decisions addressed the merits of the laws, although each will continue to be challenged, and it is likely that some will return to the Supreme Court.

**A partir del análisis de la macro y micro-estructura del texto y su contenido, responder las siguientes preguntas con *CLARIDAD, CONCISIÓN Y PRECISIÓN***

1. Explicar las instancias del caso abordado por el texto. Establecer y mencionar el orden en que se sucedieron la instancias, el tribunal interviniente en cada una y las decisiones respectivas.

2 ¿Cuál es el conflicto que generó la intervención de la Corte? Desarrolle.

3. Establezca la fundamentación del estado respecto de la ley SB 14 y, asimismo, la posición tomada por las organizaciones defensoras de los derechos civiles y la del Ministerio de Justicia respectivamente (cite ejemplo)

4. ¿Cuál fue la evolución de las decisiones de la Corte respecto de la identificación de los electores? Desarrolle

5. ¿Qué fallos se citan? Ordene la información.

Firma:_____

Aclaración:_____

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## ***Case Comment: Sea Shepherd UK v Fish & Fish Ltd [2015] UKSC 10***

JUSTICES: Lord Neuberger (President), Lord Mance, Lord Kerr, Lord Sumption and Lord Toulson

This judgment contains a useful summary of the law on accessory liability in tort. This principle is necessarily fact-sensitive, and so although the key cases are discussed they come with a warning that each case must be considered on its own merits. It is interesting, therefore, that where the dissenting judges differed from the majority was not on a question of law but on the application of that law to the facts of the case.

The majority overturned the decision of the Court of Appeal, ruling that the first instance judge had been entitled to find that Sea Shepherd UK's ("SSUK's") actions were not sufficient for it to be liable as a joint tortfeasor.

**Facts**

SSUK is the UK branch of the Sea Shepherd Conservation Society (**"SSCS"**), an organisation based in the USA. In June 2010, a boat named the 'Steve Irwin', beneficially owned and operated by SSCS, was used as part of a campaign called 'Operation Blue Rage' through which SSCS hoped to disrupt illegal tuna fishing. The Steve Irwin rammed and tore open cages belonging to Fish & Fish Limited, freeing the live bluefin tuna which Fish & Fish were attempting to transport to Malta.

SSUK has only one employee, who was not on board the Steve Irwin. Although the Steve Irwin was registered under the name of SSUK, it was beneficially owned and controlled by SSCS (this finding was not challenged on appeal). The acts by which SSUK contributed to Operation Blue Rage were by approving a fundraising mailshot (designed, organised and paid for by SSCS), as a result of which they received £1,730 in donations, which were passed to SSCS. The mailshot stated that SSCS intended to "*seize, cut, confiscate and destroy every illegal tuna fish net we find*". SSUK also passed on the names of two people who contacted them about volunteering, who then travelled to France and did a day's work on the Steve Irwin.

Fish & Fish brought the action against SSUK and attempted to join SSCS and Captain Paul Watson (the founder of SSCS) to the action, on the basis that SSUK had joined with SSCS and Mr Watson in a common design. A preliminary issue trial was held to determine whether SSUK was liable as a joint tortfeasor for the damage suffered by Fish & Fish.

At first instance, Hamblen J found that there was no common design to commit a tort, and also that SSUK's contribution to Operation Blue Rage had not been significant.

**Legal issues**

In determining liability as a joint tortfeasor, it had to be established: (1) whether SSUK had assisted SSCS and Mr Watson with the commission of a particular act; (2) whether this assistance was in pursuance of a common design that the act be committed; and (3)

whether the planned act was, or turned out to be, tortious. If these elements were met then SSUK would be liable as a joint tortfeasor.

Lord Kerr characterised the key question before the Supreme Court as whether it had been open to Hamblen J to conclude that SSUK's facilitation of SSCS's alleged tortious activity amounted to no more than a *de minimis* contribution.

Hamblen J's findings of fact were not challenged.

**Majority Supreme Court judgments**
Lord Neuberger stated that a defendant should not escape liability simply because his assistance is minor compared to the actions of the primary tortfeasor, or indirect so far as any consequential damage to the claimant is concerned. The claimant does not need to show that the tort could not have happened without the assistance of the defendant. Lord Neuberger agreed with Lord Sumption (dissenting) that, once the assistance is "*more than trivial*", the proper way of reflecting the defendant's minor contribution "*is through the court's power to apportion liability*".

Lord Neuberger noted that mere facilitation is not enough; there must be a common design to perform the act constituting or giving rise to the tort. However this does not need to be an equal contribution to the primary tortfeasor. Lord Toulson noted that, although *Sabaf SpA v Meneghetti SpA* [2002] EWCA Civ 976 referred to the joint tortfeasor "*making the act his own*", this merely means that "*the defendant must have involved himself in the commission of the tort in such a way as to justify the conclusion that he combined with the other[s]*" to commit the tort.

It is not necessary that the defendant appreciated the act constituted or gave rise to a tort. Lord Neuberger stated, "*It is not enough for the claimant to show merely that the activity… was carried out tortuously if it could also perfectly well be carried out without committing any tort. However, the claimant need not go so far as to show that the defendant knew that a specific act harming a specific defendant was intended*." Once a defendant is party to a common design, "*he cannot excise from the scope of the design aspects which he knows are included in it, but does not support*".

In applying the law, the Court considered the two factors relied upon by Fish & Fish as evidence of SSUK's involvement in the common design: firstly, SSUK's assistance in recruiting volunteers for the operation, and secondly the involvement of SSUK in raising money for Operation Blue Rage.

The question for the court was not to assess the facts for themselves, but to assess whether, on the basis of these two factors, Hamblen J had been "*entitled to conclude that the extent to which SSUK assisted SSCS was too trivial to bring SSUK within the scope of the tort*" (per Lord Neuberger). This question was concerned with the level of restraint that an appellate court should apply in reviewing the decision of a first instance judge involving the exercise of judgment on findings of fact. Citing *In re B (A Child) (Care Proceedings Threshold Criteria)* [2013] 1 WLR 1911, Lord Kerr considered that the issues which justify a very high hurdle for an appeal on an issue of primary fact apply (though with somewhat less force) in relation to an appeal regarding evaluation of facts. Therefore the question was whether Hamblen J's finding that SSUK's actions "*played no effective part in the commission of the alleged tort*" was "*insupportable*".

Hamblen J had considered whether the matters relied on by Fish & Fish had any significance to the commission of the tort, as another way of considering whether SSUK had combined to secure the doing of acts which proved to be tortious. Lord Toulson stated that this approach was acceptable: "*there is no formula for determining that question and it would be unwise to attempt to produce one.*"

None of the judges considered that the recruitment of volunteers had been significant, although Lord Neuberger noted if the recruitment had been more successful his view

"*may well have been different*".

In relation to the fundraising mailshot, Lord Neuberger stated that the furthest Fish & Fish could go would be to say that SSUK adopted the sending of the mailshot by not objecting to its name being used, and retrospectively adopted it by accepting payments from members of the public: "*SSUK was at best a sort of sleeping partner*". He agreed with Lords Sumption and Mance (both dissenting) that £1,730 was not *de minimis* in itself: "*if SSUK had pursuant to its own initiative and at its own expense*" prepared and sent out the mailshot, then it would not have escaped liability.

Similarly to Lord Neuberger's comment regarding on the recruitment of volunteers, Lord Kerr considered that if the donations received and transmitted by SSUK had in fact been substantial, its contribution could be said to be more than *de minimis*.

Lord Kerr stated that, at the least, "*it cannot be said that it was plainly not open*" to Hamblen J to reach the conclusion he did, and therefore the Court of Appeal should not have interfered with his judgment to that effect.

However, the Supreme Court disagreed with Hamblen J's finding that Operation Blue Rage did not amount to a common design which contemplated the committing of tortious acts. Lord Neuberger thought it "*clear that [Fish & Fish] did establish that SSUK had sufficient knowledge that tortious acts were contemplated*". While "*general approval*" could not amount to assistance on its own, a defendant cannot escape accessory liability "*by saying that, although he supported the activities generally, he did not support the carrying out of tortious acts*". Lord Sumption (dissenting) described Hamblen J's conclusion as "*unrealistic*"; "*the common design of SSCS and SSUK [was] that the nets of any fishermen whom they considered to be poachers should be damaged and destroyed*". If two parties design to commit a tort in a certain eventuality, then "*it is irrelevant that they both appreciated and perhaps even hoped that it would not occur*". On this basis Lord Toulson commented that, if SSUK had been held to have assisted SSCS, then he would have found that these acts were done in pursuance of a common design. (…)

**Comment**
The majority considered the assistance, in the scheme of Operation Blue Rage, was rightly considered to be insignificant by Hamblen J; the dissenting judges argued that the act of allowing the mailshot to be sent out in the name of SSUK and the sums donated could not reasonably be seen to be legally equivalent to nothing. Also, the majority considered that only the actual assistance given by SSUK was relevant, whereas Lord Sumption thought that the potential assistance that could have resulted from their actions should be considered.

Unfortunately, for the Sea Shepherd organisation (and for blue fin tuna), this judgment did not condone SSCS's acts but merely held that it could not be sued in England and Wales.

*UK Supreme Court Blog*

**A partir del análisis de la macro y micro-estructura del texto y su contenido, responder las preguntas enumeradas a continuación. con *CLARIDAD, CONCISIÓN Y PRECISIÓN***

1. ¿Cómo resolvió el Tribunal de Primera Instancia en la causa en cuestión? ¿Cuáles fueron los fundamentos?

2 ¿Cuál era el reclamo de la parte actora y qué se debía probar para que éste prosperara?

3) ¿Cómo resolvió la Corte y con qué argumentos fundamentó su decisión? ( Indicar por lo menos tres de los puntos principales detallados en el voto mayoritario)



Firma:_____

Aclaración:_____

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## Supreme Court sides with death row inmate in racial discrimination case

The Supreme Court ruled Monday morning in favor of a death row inmate in a case concerning race discrimination in jury selection.

Timothy Tyrone Foster, an African-American, is on death row in Georgia for the 1987 murder of an elderly white woman, Queen Madge White. The jury that convicted him was all white. Twenty years after his sentence his attorneys obtained notes the prosecution team took while it was engaged in picking a jury, including marking potential jurors who were black had a "b" written by their name.

"The focus on race in the prosecution's file plainly demonstrates a concerted effort to keep black prospective jurors off the jury," Chief Justice John Roberts wrote in the majority opinion. Justice Clarence Thomas was the only dissenter.

The 7-1 decision comes as a welcome relief to critics who say racial discrimination in jury selection persists across the country some 30 years after the Supreme Court ruled potential jurors cannot be struck because of race.

The decision does not vacate Foster's conviction; it opens the door for Foster to go back to the Georgia state court and argue for a new trial.

The case is likely to cause other inmates across the country with similar claims to come forward and to seek a new trial.

Monday's ruling can provide "new life to these so-called Batson claims in the lower courts and the issue of racial bias in jury selection," said Steve Vladeck, CNN contributor and law professor at American University Washington College of Law, referring to the 1986 case *Batson v. Kentucky*.

Foster's lawyers argued the notes reflect the fact the prosecution illegally took race into consideration as it struck every potential black juror. Georgia argued the notes reflect the prosecutors were simply preparing themselves for a racial bias challenge.

"The State's new argument today does not dissuade us from the conclusion that its prosecutors were motivated in substantial part by race," Roberts wrote.

"Two peremptory strikes on the basis of race are two more than the Constitution allows," he added.

"This discrimination became apparent only because we obtained the prosecution's notes which revealed their intent to discriminate. Usually that does not happen," said Foster's lead lawyer, Stephen Bright, from the Southern Center of Human Rights. "The practice of discriminating in striking juries continues in courtrooms across the country. Usually courts ignore patterns of race discrimination and accept false reasons for the strikes."

In his dissent, Thomas argued that the court didn't have the power to review the Georgia state court decision. Thomas also said he believed the Supreme Court owed more deference to the lower court's ruling that prosecutors had race-neutral reasons for striking specific jurors.

In his view, "The Court today invites state prisoners to go searching for new 'evidence' by

demanding the files of the prosecutors who long ago convicted them . ...I cannot go along with that 'sort of sandbagging of state courts.' New evidence should not justify the relitigation of Batson claims," Thomas wrote.

"Even in the face of overwhelming evidence of racial bias on the part of the prosecutors, Justice Thomas still would have deferred to the state court's conclusion that there was no unconstitutional discrimination," Vladeck said.

"The notion that, as Justice Thomas suggested, it is 'flabbergasting' that newly discovered evidence could prove racial bias on the part of prosecutors is itself flabbergasting, especially given the facts of this case, and an alarmingly deferential view for a Supreme Court justice to take," Vladeck added.

## What the prosecutor's notes showed

(...) Nearly 20 years after the conviction, through an open records request, Foster's lawyers obtained the notes the prosecution team took while it was engaged in the process of picking a jury.

Foster's lawyers said the notes reflect that the prosecution illegally took race into consideration as it struck every potential black juror.

"We have an arsenal of smoking guns in this case," Bright told the justices at oral arguments.

"The prosecutors in this case came to court on the morning of jury selection determined to strike all the black prospective jurors," Bright said. "Blacks were taken out of the picture here, they were taken and dealt with separately."

Beth A. Burton, Georgia's Deputy Attorney General told the justices that the prosecutors at the time were anticipating future challenges from Foster's team and that is why they highlighted information concerning black jurors and prepared race-neutral explanations for the strikes.

The notes, released in court filings, were taken as the legal teams prepared to pick a jury. Each side was granted "peremptory challenges" that allowed them to dismiss potential jurors without explanation. But Supreme Court precedent -- reaffirmed in 1986 -- says, however, that jurors cannot be struck because of their race.

In the Foster case, the state and the defense used their peremptory strikes to reduce the pool to 12 jurors and four alternates. The state struck the four black potential jurors.

One set of documents from the prosecution files shows that potential jurors who were black had a "B" written by their name and their names highlighted with a green pen. On some juror questionnaire sheets, the juror's race "black," "color" or "negro" was circled. One juror, Eddie Hood, was labeled "B #1. Others were labeled B#2, and B#3.

Another set of the prosecution notes contains a coded key to identify race. There is a list of six "definite no's" --the top five are black.

The Supreme Court's 1986 case held that once a defendant has produced enough evidence to raise an inference that the state impermissibly excluded a juror based on race, the state must come forward with a race-neutral explanation for the exclusion.

According to Bright, the states' race-neutral justifications didn't hold up. For example, the prosecution said one reason it struck a 34-year-old black woman was that she was near the age of Foster.

*By Ariane de Vogue, CNN Supreme Court Reporter* May 23, 2016

**A partir del análisis de la macro y micro-estructura del texto y su contenido, responder las siguientes preguntas con *CLARIDAD, CONCISIÓN Y PRECISIÓN***

1. ¿Qué resolvió la Corte Suprema de los EEUU y cómo fundamentó dicha decisión?

2. ¿Cuál fue el argumento principal de la disidencia?

3. ¿Qué efectos producirá dicha decisión en el caso particular de autos y, en general, potencialmente respecto de otros condenados?

4. ¿A qué antecedentes hace referencia el texto con referencia al tema en cuestión?

5. ¿De qué elementos probatorios se valió la defensa para sustentar su petición? ¿Qué argumentos esgrimió la contraria?

Firma:_____

Aclaración:_____

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## High Court Pushes Britain Closer to a Hard Brexit

The November 3 ruling by a British High Court that Parliament must vote before the British government invokes Article 50 of the Lisbon Treaty has been seen by many as making it less likely that the United Kingdom will leave the European Union.

In reality, although it may slow the process, it could also lead to a much more difficult negotiation with the other EU member states and even increase the likelihood of a "hard Brexit" in which the U.K. loses access to the single market.

Assuming the Supreme Court confirms the High Court ruling in December, British Prime Minister Theresa May will be faced with two options.

First, her government can send a bill to Parliament aimed at securing approval for its course of action vis-à-vis Brexit. If done under the emergency process, this would not cause a considerable delay.

The government may also decide to use a resolution, rather than a bill, which can be passed in as little as a day. It is likely that Parliament—both the House of Commons and the House of Lords—would approve the move to Brexit despite Parliament's supposed majority in favor of remaining in the EU.

The strong British sense of fair play makes it unlikely that members of Parliament would be eager to overturn the referendum and be accused of dictating to the public. More important, the Conservative government has a majority of 15 in the House of Commons, and it would undoubtedly expect all party members to support the government, whatever their own personal feelings.

It should not be forgotten that Parliament is different from the U.S. Congress, which is designed to provide "checks and balances" to the executive. In the U.K., MPs from the governing party are expected to support the government, and in the case of a Brexit vote the government would undoubtedly insist on that support, with strong penalties for any dissenters.

Given the disarray in the Labour Party, the government may well pick up a few supporters who either genuinely support Leave or who do not want to be seen as voting contrary to the will of the people.

However, Parliament can modify a bill or resolution in a way that imposes conditions on the government's strategy. Similarly, while the House of Lords cannot stop a determined House of Commons, it can also try to impose conditions on the government's negotiating strategy.

Those conditions are most likely to involve retaining access to the single market and limiting free movement of EU citizens. There could also be an insistence on escaping the jurisdiction of the European Court of Justice.

But if Parliament passes a bill that imposes these specific aims on the government, it could lead to the outcome least intended by those who initiated the case—a hard Brexit.

While it is often ignored in the British discussion, the fact is that there are 27 other negotiating partners, and they hold most of the power. The U.K.'s post-Brexit relationship with the EU will not be determined by a simple British choice, but by the willingness of the EU-27 to reach agreement and they are determined that the U.K. will not be in a better situation after Brexit than any EU member state.

For all EU members, access to the single market requires free movement of people and submitting to ECJ jurisdiction. This is also the case for Norway, which is not even a member and pays a lot of money for the privilege.

If the U.K. were to trigger Article 50 with the government instructed to secure both access to the Single Market but limits on free movement of EU citizens, its negotiating partners would wonder why the U.K. believed for one second that it could secure a result that gives it more benefits and fewer costs than any real member state.

With no negotiating room because of Parliament's instructions, the May government would find itself unable to reach agreement with the others before the two-year clock on negotiating an exit runs out. The U.K. would then simply fall out of the treaties and would be at the mercy of its negotiating partners for any transitional or post-Brexit arrangements.

May also has a second option—a snap election. If she decides that Parliament, in passing a bill, has imposed so many conditions that it has unjustly tied her hands, she may decide to go to the country.

In the very unlikely event that Parliament voted down a Brexit bill, she would have to call an election if her government was to retain any credibility. A prime minister cannot repeatedly say, "Brexit means Brexit, and we are going to make a success of it" and then just accept Parliament's disagreement.

While some may see a general election as a second referendum and hope that the British people will reconsider their earlier vote, the reality is more complicated.

May would undoubtedly campaign on a pro-Brexit ticket, but one that gives the government the flexibility to get "the best deal possible." Labour's approach to Brexit is so muddled, and its general policy approach uncertain given the split between leader Jeremy Corbyn and the parliamentary party that it is unlikely to be an attractive option for voters.

Those supporting Remain would be left with the option of the small Liberal Democrats, or the Scottish Nationalists, at best a regional choice.

Opinion polls since the June referendum show a steady rise in support for the Conservatives. The latest YouGov poll shows 41 percent for Conservatives, 27 percent for Labour, 11 percent for the U.K. Independence Party (UKIP), 10 percent for the Liberal Democrats and 6 percent for the Scottish National Party (SNP). Thus, if May decides to call an election, she will most likely end up with a free hand to pursue the Brexit negotiations. The government is now appealing the High Court ruling.

It may succeed and thus win a flexible mandate for the Brexit negotiations. But if the ruling stands, efforts by Parliament to limit the government's negotiating options may dangerously stalemate talks with the EU-27 and preclude reaching an agreement. Or the prime minister may find it tempting to call a general election.

In either situation, the most likely result is a "hard" Brexit or worse.

*www.newsweek.com*

**A partir del análisis de la macro y micro-estructura del texto y su contenido, responder las siguientes preguntas con *CLARIDAD, CONCISIÓN Y PRECISIÓN***

1. Explicar el título del artículo

2. ¿Cómo podrá proceder el gobierno británico de confirmarse el fallo dictado? (máximo 70 palabras)

3. ¿Qué comparación plantea el texto respecto de los órganos legislativos de los EE.UU. y del Reino Unido? ¿Cuál es su relevancia para el caso en cuestión?

4. ¿De qué forma puede el Parlamento condicionar al Gobierno?

5. ¿Qué postura es probable que adopten los restantes miembros de la EU? ¿Cuáles son los posibles riesgos para el Reino Unido? Marcar en el original el párrafo de referencia

Firma:_____

Aclaración:_____

D.N.I.:_____