

EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

GEORGIA COALITION FOR THE
PEOPLES' AGENDA, INC., as an
organization; et al.,

Plaintiffs,

v.

BRIAN KEMP, in his official capacity as
Secretary of State for the State of
Georgia,

Defendant.

Civil Action No.
1:18-cv-04727-ELR

DECLARATION OF GERARDO ELEAZAR GONZALEZ

Pursuant to 28 U.S.C. § 1746, I, Gerardo Eleazar Gonzalez, declare as follows:

1. I have personal knowledge of the matters stated herein and would testify to the same if called as a witness in Court.
2. I am the Executive Director of the Georgia Association of Latino Elected Officials (GALEO), a plaintiff in this matter, and am knowledgeable about its operations.

3. GALEO was founded in 2003, and works to “increase civic engagement and leadership development of the Latino/Hispanic community across Georgia.”¹ Protecting and promoting the voting rights of Georgia’s Latino U.S. citizens is essential to this mission. The organization devotes significant time and resources to conducting voter registration drives, voter outreach, assistance with voter ID and “Get Out The Vote” efforts to increase turnout of Latino voters.
4. GALEO is one of the oldest, largest, and most significant organizations promoting and protecting the civil rights of Georgia’s Latino community.
5. Today, GALEO has approximately 230 members across Georgia.
6. There is a Latino voter registration gap in Georgia. While the number of Latinos registered to vote has nearly tripled since 2004, Latinos still only make up approximately 2.3 percent of Georgia’s registered voters, despite making up 9 percent of Georgia’s total population.²
7. GALEO has worked with other organizations like the Georgia NAACP, Asian-Americans Advancing Justice-Atlanta (AAAJ-Atlanta), and other civic engagement groups to hold voter registration drives and engage in get

¹ GALEO’s mission statement can be found at <http://galeo.org/about-us/>.

² http://sos.ga.gov/index.php/Elections/voter_registration_statistics.

out the vote efforts in Georgia, and collaborate on events such as those concerning National Voter Registration Day.

8. GALEO also collaborates extensively with AAAJ-Atlanta on registering voters at naturalization ceremonies and other voter registration efforts targeted at new U.S. citizens throughout Georgia. Since August 2013, we have collaboratively assisted voter registration of approximately 33,710 people at the naturalization ceremonies. In 2018, we have collaboratively assisted voter registration of 6,970 people at naturalization ceremonies.
9. GALEO also collaborates with the Georgia Immigrant Alliance for Civic Empowerment, which is led by AAAJ-Atlanta and the Center for Pan Asian Community Services.
10. As a result of my work on civic engagement and voter registration, I am aware of the stringent “exact match” voter registration system that requires information on a voter registration application, such as first, middle, and last name, date of birth, and driver’s license or Social Security numbers match exactly with the information contained in the Georgia Department of Drivers Services (DDS) or Social Security Administration database.

11. I am also aware that DDS keeps records on citizenship status, which are checked if an applicant provides a Georgia driver's license or state ID card number on his or her voter registration application.
12. It is my understanding that an application may fail the exact match process due to minor discrepancies between the information provided on the voter registration application and the information in the DDS and SSA databases, such as a missing hyphen or use of a nickname.
13. An application may also fail the "exact match" process because a county registrar cannot decipher the handwriting of an applicant and instead guesses as to the spelling of a name when entering it into Georgia's statewide voter registration system, known as "Enet," instead of calling the applicant and asking for clarification. Even a seemingly minor error by the registrar, such as transposing two letters in a name, will cause the application to fail verification.
14. Clerical errors are of particular concern to Latinos because it is common for Latinos to have two last names. I have observed that an applicant may be flagged as "non-match" when, for example, a registrar inputs one of an applicant's last names as his or her middle name. This application would fail the exact match verification process through no fault of the applicant.

15. Latinos commonly have hyphenated last names and if a registrar neglects to include the hyphen, the application would fail the verification system.
16. For example, I assisted Elton Garcia-Castillo, an organizer with GALEO, when he registered to vote. Mr. Garcia-Castillo's application failed the "exact match" process and was put into "pending" status because the registrar did not include the hyphen in his last name, despite the fact Mr. Garcia-Castillo correctly included the hyphen on his voter registration form.
17. These clerical errors can also happen when information is entered into the DDS and SSA databases. This may happen through no fault of the applicant, who correctly and accurately fills out his or her registration form.
18. I have received inquiries from and assisted voter registration applicants who obtained a driver's license before being naturalized and then subsequently attained their citizenship. When that applicant registers to vote, he or she will be a U.S. citizen but may be listed as a non-citizen in the DDS database.
19. For example, I was contacted by two registration applicants, Maria Palacios, a GALEO member and alumnus of our Institute for Leadership, and Francisco Barreto, who had become naturalized citizens and submitted registration applications following their respective naturalization ceremonies. They were both inaccurately flagged as non-citizens in the

DDS database and failed the verification process although they submitted naturalization certificates with their voter registration applications.

20. My understanding is that if the information contained in the voter's application does not exactly match the applicant's information in the DDS or SSA databases, the applicant is sent a notification letter to which they must respond. If an applicant fails to respond to the notification letter, his or her application is automatically cancelled 26 months after the notification is issued. The applicant then must begin the process all over again.

21. I am concerned that the Georgia Secretary of State's Office is not sending out letters to individuals who are inaccurately flagged as potential non-citizens in Spanish.

22. The United States Census Bureau estimates that over 532,908 people in Georgia speak English less than "very well," which is designated as Limited English Proficiency (LEP). The Census Bureau estimates that 337,623 (63.4%) of them are Spanish speakers.

23. There is a significant barrier to register to vote when an applicant cannot use his or her native language.

24. Because a significant portion of Georgia's Latino population are LEP, it is foreseeable that some individuals who are inaccurately flagged as potential

non-citizens will have trouble understanding the notification letter that they receive from county election officials.

25. Latino applicants who have been inaccurately flagged as potential non-citizens have had their registrations suspended pending verification of citizenship and have contacted GALEO. GALEO must then spend time assisting these applicants with resolving the problem and ensuring that their voter registration applications are processed.

26. GALEO staff spends a significant amount of time and energy on educating and registering voters and, where necessary, helping them vote in elections. Assisting individuals experiencing difficulty navigating the voter registration verification system takes time away from these efforts and requires GALEO to divert its resources to address these problems.

27. Whenever an applicant who registers to vote through GALEO experiences a problem, GALEO follows up with him or her. This often occurs because the applicant has difficulty speaking English.

28. GALEO is currently devoting significant staff time and resources to ensuring applicants are properly registered for the November 2018 election, and will have to do so in the future for other elections. These efforts will

divert these invaluable resources away from GALEO's other voter education and mobilization activities.

29.I anticipate GALEO will have to devote even more staff time and resources to answer questions and follow up with applicants to resolve their voter registration status due to Georgia's stringent verification system.

30.I am very concerned about the impact these issues will have on applicants, many of whom are new citizens and voting for the first time. It is possible this experience will dissuade people from voting in the future.

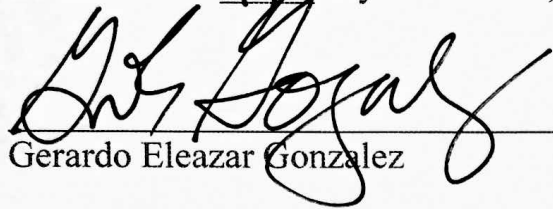
31.This is especially true where voters are inaccurately flagged as potential non-citizens even though they provided a copy of their naturalization certificate with their voter registration application.

32.The people GALEO helps to register to vote are United States citizens and should not be subjected to significant burdens because they are naturalized citizens.

33.There is a heightened state of anxiety in the current political climate surrounding immigration issues that that might cause some Latinos to be reluctant to respond to a governmental inquiry when they have been inaccurately flagged as a potential non-citizen.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 17 day of October, 2018, in Atlanta, Georgia.


Gerardo Eleazar Gonzalez