

EXHIBIT 12

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 MARIA DEL ROSARIO PALACIOS

Pursuant to 28 U.S.C. § 1746, I, Maria del Rosario Palacios, 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 28 years of age. I am a resident of Gainesville, Georgia.
3. I have lived in Georgia since 1994.
4. In 2009, I became a permanent resident of the United States and applied for and received a Georgia driver's license.

5. On June 23, 2017, I attended my naturalization ceremony and became a United States citizen. It was one of the best days of my life.
6. Voter registration was offered immediately following the naturalization ceremony. There was a table in a waiting room, where a number of volunteers were stationed. One of the volunteers handed me a clipboard with a registration form and I filled it out.
7. I was very excited to register to vote.
8. One of the volunteers made a copy of my naturalization certificate on site and handed it back to me so I could include it with my registration application.
9. I made sure to submit the copy of my naturalization certificate with my voter registration application.
10. I had been working full-time at the Georgia Association of Latino Elected Officials (GALEO) since 2016 and knew that this was their policy when assisting new citizens with registering following naturalization ceremonies.
11. I have been helping individuals to register to vote at naturalization ceremonies since 2013.
12. Before turning my voter registration form in, I checked it to make sure that all of the information supplied on it was accurate.

13. On June 30, 2017, the Hall County Board of Elections (BOE) sent me a letter stating that my application was on hold pending verification of citizenship because the Georgia Department of Driver Services (DDS) records indicated I was not a U.S. citizen. *See Exhibit A.*

14. I was upset when I read the letter because I knew that I am a citizen and eligible to vote and had even enclosed a copy of my naturalization certificate with the application showing that I was a United States citizen. I was also concerned because I was planning to run for the Gainesville City Council in the 2017 election, and was worried that I would not be registered and able to vote by that time.

15. Shortly after receiving the letter, I called the Hall County BOE but the employee with whom I spoke could not answer my questions and provided no meaningful assistance. She referred me back to the letter that the BOE had sent me and said that I must produce proof of citizenship to register, even though I had included a copy of my naturalization certificate with my voter registration application.

16. Since I was working for GALEO at the time, I discussed the status of my voter registration application with Jerry Gonzalez, the organization's Executive Director, and asked what I should do to get on the voter rolls.

17.Mr. Gonzalez referred me to Julie Houk, an attorney with the Lawyers'

Committee for Civil Rights Under Law. I understand that Ms. Houk made an inquiry with the Georgia Attorney General's Office and that my registration status was subsequently changed to "active" from "pending."

18.A few days later, I also checked the Georgia My Voter Page and confirmed that I was registered to vote.

19.In November of 2017, I ran as a candidate for the Gainesville City Council.

I lost the election, but was proud to have the opportunity to run for the position.

20.I was able to vote for myself in that election, which was very important to me.

21.I feel fortunate because if I had not been working with GALEO and been engaged in the community, I would not have known what to do to ensure that I was added to the voter rolls after it was put on hold.

22.Today, I work to promote civic engagement in Hall County and I try to assist local community members and eliminate barriers to voting.

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

Executed this 16th day of October, 2018, in Gainesville, Georgia.

_____

Maria del Rosario Palacios

EXHIBIT A



Hall County Government

ELECTIONS & VOTER REGISTRATION

**BOARD OF ELECTIONS &
REGISTRATION**

Kenneth Cochran, Member (R)
Kimberly Copeland, Member (D)
Craig Lutz, Member (D)
Gala Sheats, Member (D)

IMPORTANT VOTER REGISTRATION INFORMATION FROM HALL COUNTY

June 30, 2017

REGISTRATION #: [REDACTED]
MARIA DEL ROSARIO PALACIOS
[REDACTED]
GAINESVILLE GA 30504

Dear Applicant:

The HALL COUNTY BOARD OF REGISTRARS recently received your voter registration application.

The information you provided on your voter registration application is matched to information with the Department of Driver Services (DDS) and/or with the Social Security Administration (SSA) for verification purposes. This process is required by state and federal law.

One of the pieces of information that did not match up was whether you are a United States Citizen. When you registered to vote, you said that you were a citizen, but the Department of Driver Services record does not match that information. Under state and federal law, you must be a U.S. Citizen in order to register to vote. Your application therefore remains in pending status. While in pending status, you are still able to vote by showing proper identification and proof of citizenship at your polling place, but you should immediately take the below steps to resolve this issue in order to improve your voting experience.

You can finalize your application now by providing our office with a document that shows you are a United States citizen. A list of the types of documents that you could use to show citizenship is included with this letter.

You may return a copy of documentary proof of citizenship by personal delivery, mail, email as an attachment, or facsimile to the following address, fax or email addresses:

HALL COUNTY VOTER REGISTRATION
P O BOX 1435
GAINESVILLE 30503
770 - 531 - 6945 (Phone)
770 - 531 - 3931 (Fax)
ELECTIONS@HALLCOUNTY.ORG

List of acceptable documents to prove citizenship:

- Birth certificate, issued by a U.S. State (if the person was born in the U.S.), or by the U.S. Department of State (if the person was born overseas and the parents registered the child's birth and U.S. citizenship at birth with the U.S. Embassy or Consulate).
- U.S. Passport, issued by the U.S. Department of State.
- Certificate of Citizenship, issued to a person born outside the U.S. who was still a U.S. citizen at birth, or to a person who later automatically became a U.S. citizen.
- Naturalization Certificate, issued to a person who became a U.S. citizen after birth through the naturalization process.
- A Report of Birth Abroad of a U.S. Citizen.
- A Certification of birth issued by the Department of State.
- A U.S. Citizen ID card.
- An American Indian Card issued by the Department of Homeland Security with the classification code "KIC" (Issued by DHS to identify U.S. citizen members of the Texas Band of Kickapoos living near the U.S./Mexican border).
- Final adoption decree showing the child's name and U.S. birthplace.
- Evidence of civil service employment by the U.S. government before June 1976.
- An official U.S. military record of service showing a U.S. place of birth.
- A Northern Mariana Identification Card (Issued by the INS to a collectively naturalized citizen of the U.S. who was born in the Northern Mariana Islands before November 4, 1986).
- Extract of U.S. hospital record of birth established at the time of the person's birth indicating a U.S. place of birth.
- Life or health or other insurance record showing a U.S. place of birth and was created at least 5 years before the initial application date.
- Federal or State census record showing U.S. citizenship or a U.S. place of birth (Generally for persons born 1900 through 1950).
- Institutional admission papers from a nursing home, skilled nursing care facility or other institution which indicates a U.S. place of birth.
- Medical (clinical, doctor, or hospital) record and was created at least 5 years before the application date and indicates a U.S. place of birth.
- A driver's license or identification card issued by an agency of a U.S. state if that agency indicates on the driver's license or identification card that the applicant has provided satisfactory evidence of United States citizenship to the agency.
- Other document that was created at least 5 years before the application. Document must be one of the following and show a U.S. place of birth: Seneca Indian tribal census record; Bureau of Indian Affairs tribal census records of the Navaho Indians; U.S. State Vital Statistics official notification of birth registration; an amended or delayed U.S. public birth record that is amended more than 5 years after the person's birth; or statement signed by the physician or midwife who was in attendance at the time of birth.
- If other forms of documentation cannot be obtained, documentation may be provided by a written affidavit, signed under penalty of perjury, from two citizens, one of whom cannot be related to the person in question, who have specific knowledge of event(s) establishing the person in question's citizenship status. The person in question or another knowledgeable individual must also submit an affidavit stating why the documents are not available. Affidavits are only expected to be used in rare circumstances.

Personal information such as the month and day of your date of birth, driver's license number, and Social Security number is kept confidential and protected under state law. By providing correct information, you may avoid the possibility of a mismatch with other voter information within the statewide voter registration system. Your cooperation assures the accuracy of the registration process for all voters in Georgia.

While your application is in pending status, you are still able to vote by absentee ballot, during early voting, or on Election Day if you show 1) one of the acceptable forms of identification described below, and 2) one of the forms of proof of citizenship described on the enclosed list when you go to vote or when you request an absentee ballot. The acceptable forms of photo ID are:

- (1) A Georgia driver's license (including an expired Georgia driver's license);
- (2) Any valid state or federal government issued photo ID, including:
 - a. free Georgia voter identification card issued by your county's registrars;
 - b. Georgia State ID issued by the Georgia Department of Driver Services (DDS);
 - c. valid student ID card issued by a Georgia public college, university or technical school;
 - d. A valid out-of-state driver's license;
 - e. public transit issued photo ID card; and
 - f. any other federal or state agency or government issued photo ID card.
- (3) A valid United States passport;
- (4) A valid employee photo identification card issued by any branch, department, agency, or entity of the United States government, this state, or any county, municipality, board, authority, or other entity of this state;
- (5) A valid United States military photo identification card; or,
- (6) A valid tribal photo identification card.

Once you show an acceptable form of photo identification and proof of citizenship at your polling place or early voting site, cast a ballot and receive credit for voting, your application will be changed from pending to active status.

Your Polling Place is:

PRECINCT NAME: [REDACTED]

POLLING PLACE: [REDACTED]

GAINESVILLE GA 30504 - 0000

Thank you for your interest in voting and elections in Georgia.

Sincerely,

TERENDA SARGENT
REGISTRATION COORDINATOR