

EXHIBIT 11

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 HARVEY SOTO

Pursuant to 28 U.S.C. § 1746, I, Harvey Soto, 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 Policy Analyst & Program Coordinator for Civic Engagement 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. In April of 2018, Francisco Barreto called GALEO’s office to express concern over the fact that he had not received any notification regarding his registration status even though he had submitted a voter registration application many months before.
6. I spoke with Mr. Barreto for a long time regarding his registration status. Mr. Barreto told me that he registered to vote in December of 2017, shortly after his naturalization ceremony.

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

7. Mr. Barreto told me that after his swearing-in ceremony, GALEO volunteers assisted Mr. Barreto by making a copy of his Naturalization Certificate and including that document in the pocket of his voter registration form, which should have been sufficient to prove citizenship. He told me that these forms were then sent directly to the Secretary of State's elections office.
8. At Mr. Barreto's request, I assisted him with looking up his information on the Secretary of State's My Voter Page website, and found that it said that the county registrar may need additional information to confirm Mr. Barreto's voter registration status and that he should contact the county.
9. We talked on the phone about how to address the resolve the issue concerning his voter registration application, and decided to go to the County Registrar's office together to speak with an election official in person.
10. Mr. Barreto exchanged emails and phone calls and spent a significant amount of time arranging for our trip to the Fulton County board of elections office.
11. In early May of 2018, I accompanied Mr. Barreto to the Fulton County BORE's North Annex Service Center to attempt to resolve the issue concerning his voter registration application.

12. Mr. Barreto approached the clerk and told her that he had submitted a voter registration application but had never received a response, and produced his passport and Georgia driver's license.

13. In response, the clerk informed him that he was not registered because he had been flagged as a non-citizen and that he needed to provide proof of citizenship for his registration to be processed. The clerk told him he needed to produce his naturalization certificate if he wanted his application to be processed.

14. I insisted to the clerk that a passport is sufficient to prove citizenship to register to vote in Georgia. The clerk then said that she would need to check with her supervisor and made a phone call.

15. After the phone call, the clerk informed Mr. Barreto that a passport was, in fact, sufficient to prove citizenship. She copied his passport and his Georgia driver's license, and said that his registration application would be processed.

16. Throughout the conversation, the clerk appeared reluctant to provide assistance and used an unfriendly, condescending tone of voice, which made the experience very unpleasant.

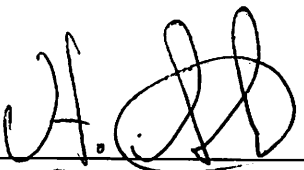
17. Mr. Barreto told me that he did not know that a passport alone is sufficient to prove citizenship under Georgia law, and that he thought he was going to have to go through the extra burden of producing his naturalization certificate before I intervened.

18. The process of Mr. Barreto proving his citizenship as a result of incorrectly being flagged as a non-citizen was time-consuming and burdensome.

19. Mr. Barreto was ultimately added to the voter rolls and was able to vote in the May 2018 primary election, but I am concerned that without my help he may not have been successful in resolving the incorrect non-citizen flag which caused his application to be put on hold.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed this 18 day of October, 2018, in Atlanta, Georgia.



Harvey Soto