

DECLARATION OF JULIE HILBERG

I, Julie Hilberg, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a 54-year-old resident of Poteet, Texas in Atascosa County.

2. I am originally from the United Kingdom. I am married to a United States citizen and retired U.S. Navy officer.

3. I most recently renewed my Texas driver license in 2014, when I was still a legal permanent resident. My driver license does not expire until 2020.

4. I became a United States citizen at a naturalization ceremony in Bexar County on April 16, 2015. I completed a voter registration form after the ceremony, and I was told that my voter registration form would be sent to my registrar in Atascosa County.

5. In June 2015, I had not yet received a voter registration card. I went to my local voter registrar's office in the city of Jourdanton in Atascosa County to re-register. I showed the election official at the office my naturalization certificate and completed a voter registration form.

6. I became a registered voter in Texas on June 26, 2015. Since becoming a registered voter, I have voted in primary, general, and special elections in 2016 and 2018.

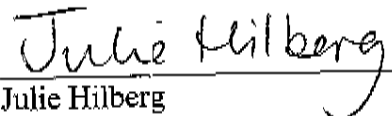
7. After Secretary of State David Whitley issued Election Advisory No. 2019-02, I became concerned that my name might appear on the list of alleged noncitizens and could be removed from the voter registration list. I was also concerned that the advisory warned that illegal voting is a second-degree felony and that he was going to turn this list over to the Attorney General for investigation and potential prosecution. That scared me.

8. On January 31, 2019, I visited the Atascosa County Elections Administrator's office. I spoke to Janice Ruple, Atascosa County's Elections Administrator, who confirmed that my name was on the list provided by Secretary Whitley to Atascosa County pursuant to the Advisory. Although Ms. Ruple knows me personally and is aware of my citizenship status, she

was unable to give me any information or assurances about whether my voter registration status would be in jeopardy as a result of my name appearing on Secretary Whitley's list.

9. I understand that Secretary Whitley's list includes tens of thousands of eligible Texan voters. I am committed to taking on an active role in pursuing this litigation with my attorneys, ensuring that the class members' interests are protected, and vigorously pursuing the class claims. I have retained counsel who are experienced in election law and voting rights litigation, civil rights litigation generally, and class action representation.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and that this Declaration was signed in New Braunfels, Texas on February 4, 2019.


Julie Hilberg