

EXHIBIT B

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

COMMON CAUSE,)	
)	
Plaintiff,)	
)	
v.)	Case No. 17-1398 (RCL)
)	
PRESIDENTIAL ADVISORY)	
COMMISSION ON ELECTION INTEGRITY,)	
<i>et al.</i> ,)	
)	
Defendants.)	
_____)	

DECLARATION OF ELIZA MCCLENAGHAN

I, ELIZA MCCLENAGHAN, hereby state, under penalty of perjury, that the following information is true to my knowledge, information, and belief:

1. I am a member of Common Cause and presently serve as the State Chair of Common Cause Florida. I submit this Declaration in support of Common Cause's Motion for a Preliminary Injunction against the Presidential Advisory Commission on Election Integrity, Department of Homeland Security, and the Social Security Administration.

2. As a member of Common Cause, I make an annual donation to the organization as well as frequently engage in Common Cause's efforts to advance voter-protection, advocacy, education, and outreach around the election administration process, money in politics, and ethics. (I should note that Common Cause encourages but does not require members to pay annuals; a sizable number, though, do make regular financial contributions to the organization.) Membership in Common Cause provides me the benefit of, among other things, receiving

numerous public education and other materials provided by the organization on topics such as election integrity and voter protection as well as the opportunity to participate in a community dedicated to advancing democratic values and voter participation.

3. As a member and state leader in Common Cause, I have been engaged in Common Cause's efforts to advance voter protection and election integrity in the state of Florida. For example, in the 2016 election, our state members and supporters mobilized volunteers to provide on-site election protection assistance. In addition, we worked with the Department of State Division of Elections and county Supervisors of Election to improve language access to voting materials under the Voting Rights Act.

4. Presently, Common Cause members and supporters in Florida are engaged in a range of non-partisan educational, outreach, and advocacy efforts. As one example, our projects include working to educate the public regarding Florida's Constitution Revision Commission, a commission that convenes every 20 years to revise the State of Florida's Constitution. As part of this project, I spoke at a public hearing about the commission rules and procedures and have encouraged the submission of comments and revisions to the commission by the public. As another example, we are engaged in activities and outreach to ensure that the 2020 Census preparation work by the state, counties and municipalities ensures that we are ready for congressional and state legislative districting in the State of Florida that is fair and appropriate. In the past, we have worked to advance online voter registration and have advocated for strong redistricting and ethics reform, among other actions.

5. On May 11, 2017, the President established the Presidential Advisory Commission on Election Integrity, which subsequently announced that it would be collecting and

maintaining sensitive personal voter data, including party affiliation and voting history. In particular, on June 28, Commission Vice Chairman Kris W. Kobach sent out a letter to all 50 states and the District of Columbia requesting that they provide sensitive personal voter data, including party affiliation and voting history. Mr. Kobach, as well as other Commission members, have stated that the Commission intends to match personal voter data collected with other data sources maintained by the federal government. On July 10, 2017, the Commission ceased its collection activities while a motion for preliminary injunction was pending in a separate lawsuit challenging the Commission's activities. After the motion was denied, the Commission resumed its data collection, issuing a letter on July 26, 2017 to states, again requesting personal voter data, including party affiliation and voter history.

6. As a result of the Commission's activities and its stated request for voter information, including party affiliation and voter history, Common Cause members in Florida have engaged in significant oppositional activities to help safeguard voter information and to ensure the integrity of the election process. On behalf of Common Cause, I have corresponded with the Secretary of State in Florida on two occasions, in an attempt to dissuade him from violating voters' rights under the law in response to the Commission's request as well as to request information from the State on any materials that it may share with the Commission. I have also personally counseled members of the public who have asked me questions about the voting and elections process in light of the Commission's collection of the data. These activities have significantly detracted from my efforts as Common Cause's Chair for the State of Florida to engage in the important ongoing projects I described above, such as the Florida Constitution Revision Commission and education and advocacy regarding preparation for the 2020 Census.

7. As a resident and registered voter in the State of Florida, I take my responsibility to vote and participate in the political process extremely seriously. I am aware under Florida Statutes which information in the voter files maintained by my local Supervisor of Election and state files by the Secretary of State are exempt from public record. I have not voluntarily given permission for my public record and non-public record information to be transferred to a federal entity by the state. To my knowledge the aggregation of voter file information has never been maintained at the federal level. The collection and possible dissemination of this sensitive private information by the Commission has undermined my confidence in the federal government, especially in light of statements by the Commission's Vice Chair and other Commission members that such data will be matched with other federal data sources. Since the Commission has not made clear to the public the reasons for the collection of this information, how the information will be used, who will access the information, how it will be secured and protected, and eventually archived or disposed, I am extremely worried about what will happen with my personal data and how the federal government will use it, or whether it will disclose it in a more public way such that any individual or organization could use and/or abuse it. I am concerned about the U.S. election system and in the ability of citizens, like myself, to express views through voting and civic engagement. Voting in an election should not carry with it the risk of my party affiliation and voter history data being collected, maintained, and studied by the federal government.

I declare under penalty of perjury under the laws of the United States of American that the foregoing is true and correct.

Executed this 28th day of July, 2017.



ELIZA MCCLENAGHAN