

DECLARATION OF RACHEL GILMER

My name is RACHEL GILMER. I am over the age of 18 and fully competent to make this declaration. Under penalty of perjury, I state the following:

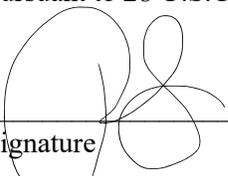
1. I am a Co-Director of the non-profit organization Dream Defenders, which has its principal office in Miami, FL.
2. Dream Defenders conducts voter engagement work throughout the State of Florida and especially in 10 counties, including Alachua, Broward, Escambia, Hillsborough, Leon, Miami-Dade, Orange, Pinellas, Seminole, and Volusia Counties.
3. The organization hosts phone banks to reach voters in advance of the election.
4. We began this year's phone bank for Florida's Presidential Preference Primary (PPP) on or about January 12, 2020. We initially hosted the phone bank 2-3 times each week.
5. In addition to our outreach phone banking, we also devised a plan to register voters in 2020. This was our first year doing voter registration work, and we set an ambitious goal to register 30,000 youth voters in Florida.
6. In the pivotal final week ahead of the PPP, the coronavirus began to affect our operations and we heard widespread concerns from members about the impact of closures and potential lockdown orders on their plans for outreach, organizing, and getting out the vote. On March 13, 2020, we increased the volume of phone outreach to voters beyond normal levels, assigning between 15 and 30 people to make calls each day.
7. Since the PPP, we have stopped fundraising for voter registration work. Instead, we are trying to scale up digital organizing to educate voters about vote-by-mail, do local advocacy around vote-by-mail, and promote vote-by-mail as an option for the communities we serve. We have assigned 22 paid staff and 250 volunteers to this effort who would otherwise be engaged in in-person canvassing, voter education on other issues, and communications work for Dream Defenders. This is a new priority that requires research and working with Supervisors of Elections (SOEs) to understand the requirements involved.

8. The unfortunate reality at this stage is that we no longer expect we will meet our goal of registering 30,000 youth voters.
9. Our pivot to organizing around vote-by-mail has caused us to reallocate funds we had planned to use on our other core programs.
10. One major change resulting from our inability to carry out our voter registration campaign as planned is that instead of in-person canvassing, we are directing people to the state's online voter registration (OVR) page. It is a significantly more burdensome process from the applicant's perspective than it would have been if we had been able to reach them with our planned canvassing program.
11. The process is more burdensome because the applicant must have a signature on file with Florida government and an ID with the Department of Highway Safety and Motor Vehicles (DHSMV), which is now closed. Of course, many of the university students we work with report that they do not have an ID with Florida's DHSMV.
12. Even when applicants do have the required ID, if they do not have a signature on file, the OVR system will not actually register them. Instead, they have to print their completed registration application from the OVR page, sign it with wet ink, and then mail it to their SOE. Many people do not have printers and cannot easily access a printer to submit a signed paper application. Finding a printer elsewhere is costly financially and risky in health terms in the midst of a pandemic.
13. Because of this tedious and burdensome multi-step process, we have encountered numerous people who have completed the online portion of this process in the OVR system and then given up when confronted with the laborious additional steps.
14. Many of our members have been displaced by the COVID-19 pandemic. This is especially true for our members who are students at Florida's universities. Many of them report that their campuses have closed for the semester, and plans for resuming in-person instruction later this year are in flux.

15. For our student members who traveled to their parents' homes after campus closures took effect, this means that they may be hundreds of miles away from their assigned polling place on Election Day, making voting in person either impossible or extremely burdensome.
16. In the March PPP, because of the late-breaking nature of the campus closures—for many, mere days before the election—displaced student members who planned to vote in person were barred by Florida's request deadline from voting by mail. So they were simply unable to vote in the PPP. We hope that this never happens again to any of our members.
17. As we have been seeking to assist people with the vote-by-mail process, we have become aware of several significant problems with Florida's vote-by-mail system.
18. When voter requests a vote-by-mail ballot be sent to the address where they are registered, they can request by phone, mail, online, in-person, or via a family member/legal guardian. But when they need that ballot to be mailed to an alternative address, they generally must send a signed request in writing either in person or by mail.
19. Many of our student members, who have been displaced from the campuses where they are registered, must request vote-by-mail ballots be sent to their parents' homes, where they are temporarily relocated during campus closures.
20. This makes requesting a vote-by-mail ballot for our student members significantly more burdensome. Not all of their parents own printers, and for student members in rural areas, mail service can be unreliable—even as making an in-person appearance to submit a vote-by-mail ballot request has become impossible or extremely burdensome for many displaced students.
21. During our outreach calls, we educate voters on their polling locations, voting options, and requirements for casting a ballot.
22. Numerous people that we reached this year have been unsure of their polling place location for Election Day.

23. During the PPP, this uncertainty was only compounded by poll worker shortages and polling place closures caused by the COVID-19 pandemic.
24. We anticipate that the counties where our members our based will likely have multiple polling place closures or re-locations, but there is little or no information available to voters regarding polling place changes.
25. We want to assist people in successfully voting in the August and November elections, but that is made more difficult by the burdensome and unfair processes that the State has implemented for registration and voting alike. Given that reality, we are concerned that many people who want to vote will be unable to cast a ballot on Election Day.

Pursuant to 28 U.S.C. § 1746: I declare under penalty of perjury that the foregoing is true and correct.



Signature

Rachel Gilmer

Printed Name

Executed on: May 26, 2020