

DECLARATION OF ANDREA MERCADO

My name is Andrea Mercado. 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 the Executive Director of NEW FLORIDA MAJORITY EDUCATION FUND and NEW FLORIDA MAJORITY (“NewFM”), an independent, non-partisan non-profit organization. I have held this position for three years.
2. Established in 2009, NewFM is a multi-racial, community-centered, racial justice organization dedicated to creating an inclusive, equitable, and just Florida by building up the unified power of the State’s historically marginalized groups. NewFM works to increase the political voice and well-being of communities of color and to build multi-racial unity across Florida through issue campaigns in the arenas of democratic rights, criminal justice reform, economic justice, climate justice, gender justice, and immigrant justice.
3. NewFM maintains a statewide presence with a regional focus on North Florida (Duval and Leon Counties) and South Florida (Miami-Dade, Broward, Palm Beach Counties). We have permanent offices in Miami, Fort Lauderdale, and Jacksonville. We have voter registration offices in Leon, Gadsden, and Palm Beach Counties. Our principal office is in Miami-Dade County. We focus on urban areas, but reach people statewide, including more rural areas, through our online, phone, and texting programs. We serve and advocate on behalf of individuals and communities in all regions in Florida and in all 14 major media markets.
4. Three years ago, we revamped our membership model to create a dues-paying component. We recognize, however, that not everyone has the financial ability to pay

dues. Our membership is thus comprised of Floridians who do not pay dues and those who do. We consider all members – dues-paying and non-dues-paying members – across Florida as well as all of our supporters to be valuable participants in NewFM.

5. NewFM has members who are disabled and have special needs, especially when voting.
6. In the arena of democratic rights, NewFM's goal is to expand Florida's democracy by ensuring that every eligible voter in Florida can exercise their fundamental and constitutionally protected right to vote. To achieve this goal, we work with our members and civic engagement organizations to assist underserved communities throughout Florida in voter registration, voter education, and get-out-the-vote ("GOTV") efforts.
7. As part of our civic engagement efforts for the Presidential Preference Primary on March 17, 2020 ("PPP"), we knocked on 30,000 doors and had conversations with over 6,000 people across Florida.
8. Florida's failure to adjust its voting laws and processes for the PPP in light of the pandemic resulted in harm to our members. Florida forced our members to choose between protecting their lives and exercising their fundamental right to vote. The decrease in Election Day turnout during the PPP did not surprise us.
9. In the aftermath of the PPP and as Florida went into full COVID-19 lockdown, our entire staff went into COVID-19 emergency response mode. We began assisting our members and communities in any way possible such as coordinating mutual aid, delivering food and supplies, and getting loved ones out of jail and prison.
10. Our members and our communities – low-income, Black, Latinx, and immigrant communities – are some of the most devastated and hardest hit by COVID-19.

11. After the PPP and as part of our COVID-19 emergency response, we moved approximately 200 staff members and volunteers from our voter registration canvassing team to a remote phonebanking team to conduct wellness checks. We have spent \$25,000 in tablets for this phonebanking team. This team has made 700,000 calls and spoke with 35,000 Floridians. We asked a series of survey questions, including questions about voting during the pandemic.
12. Our survey results demonstrate to us that there is dire lack of information about how to vote in August and this fall. In particular, respondents expressed concern about Florida's vote-by-mail ("VBM") process. Throughout our organization, we are hearing concerns and worry about the VBM process. We are hearing questions about how to request a VBM ballot, especially from people who have been displaced due to COVID-19.
13. In order to address those concerns and because state officials have not announced any plans for conducting this year's elections in light of the COVID-19 crisis, we are specifically diverting organizers to make VBM phone calls. During those calls, NewFM staff members emphasize the importance of VBM and explain how to sign up for VBM. Many individuals do not have experience voting by mail and the state is doing little to educate voters about Florida's complex VBM system.
14. In our VBM voter education efforts, NewFM is also tackling massive distrust of VBM. NewFM is hearing concerns about the U.S. Postal Service and about Florida's signature matching laws that disproportionately disenfranchise Black and Latinx voters.
15. NewFM is also hearing from individuals who wish to vote in person to avoid Florida's VBM system. We are hearing that Black and Latinx community members, particularly

returning citizens and naturalized citizens who are voting for the first time, take great pride in voting and want to vote in person at a polling site.

16. Florida's failures to adjust its election laws and processes during this pandemic has also resulted in a negative impact on our voter registration work. Typically, NewFM processes 3,000 to 5,000 voter registration application forms per month. We would have approximately 250 canvassers conducting voter registration at least five days a week in five counties: Miami-Dade, Broward, Palm Beach, Duval, and Leon.
17. Immediately following the PPP and as Florida went into lockdown, we suspended our in-person voter registration operations. Online Voter Registration ("OVR") became our only option for our voter registration work.
18. However, the OVR system in Florida is rife with problems. Among its many defects, the OVR system requires a voter registration applicant to have reliable internet service and access to a printer and printer paper in the event of an error.
19. We have had to divert significant resources to deal with Florida's faulty OVR system.
20. We are working on a voter registration "chase" program where our canvassers will call or have called people who have had voter registration forms mailed to their homes. We then follow up by phone to make sure they complete the form successfully.
21. We are also preparing to divert significant resources to launch an on-the-ground voter registration operation in communities and neighborhoods. This operation would specifically fill the gaps in Florida's OVR system. Starting in June, we will deploy a few dozen of our staff members into communities with WiFi hotspots, tablets, and printers at significant cost to ensure low-income neighborhoods that do not have access to WiFi and printers can still successfully register to vote.

Pursuant to 28 U.S.C. § 1746, I declare that I have read the foregoing document and that the facts stated in it are true.

RESPECTFULLY SUBMITTED

Miami, Florida

May 27, 2020

/s/Andrea Mercado
Signed

Andrea Mercado
Printed Name