

DECLARATION OF ROBERT WOODS

My name is ROBERT WOODS. 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 Civic Engagement Director of the non-profit organization Organize Florida Education Fund, which has its principal office in Orlando, FL.
2. Organize Florida Education Fund has supporters in all 67 of Florida's counties and members in the following counties: Brevard, Broward, Charlotte, Collier, Escambia, Hernando, Hillsborough, Lake, Lee, Leon, Marion, Miami-Dade, Orange, Osceola, Palm Beach, Pasco, Pinellas, Polk, Seminole, Suwanee, and Volusia.
3. Organize Florida Education Fund normally hosts a large-scale voter registration program throughout the State of Florida. Our current voter registration campaign began in August 2019. Every week for five days a week, 65-70 canvassers would go into neighborhoods in 9 different Florida counties to assist people in registering to vote.
4. Our canvassers assist applicants by informing them of what constitutes a complete voter registration application, verifying that all necessary information is completed, and then submitting the forms on behalf of individuals.
5. Our plan for 2020 was to conduct voter registration in 12 Florida counties until September 7, 2020 and then shift resources to helping people request vote-by-mail ballots. Since the COVID-19 pandemic began and the State of Florida initiated a state of emergency, our normal voter registration operations have been severely impacted, particularly in light of the state's failure to change election laws and rules to make it easier for eligible people to register and vote during the pandemic.
6. All of our canvassing ceased on or about March 13, 2020 and the 65-70 canvassers were uncertain of their work for approximately a week. We were forced to think of creative ways to keep canvassers employed and active when they could not register voters in person. We predict that we lost at least eight weeks of large-scale voter registration from March 13, 2020 until the present.
7. In the next few weeks, we plan to shift to online voter registration efforts wherein we will call people and assist them with registering to vote online. Our canvassers will call eligible residents

and encourage them to go to our landing page to complete a voter registration form. Our landing page will track the contact information for each user and flag that person for follow up. Our website will then route the person to the official Florida voter registration page. Within 24 hours of the person visiting our landing page, we will do quality control (“QC”) calls to confirm whether the person was able to successfully complete the Online Voter Registration (“OVR”) application. We are doing this because many people have trouble registering via the online system and Florida's OVR system does not give people notice if there are errors with their registration application.

8. We spent \$2,000 for a contractor to build the landing page that our QC callers will use to follow up with potential online registrants. If the QC callers learn that a person was unable to successfully complete their online voter registration application, we will divert more of our resources toward helping them fully complete the online voter registration process through our chase program.
9. The “chase” program will involve us adding a new organizational function of checking the voter rolls to see if OVR applicants made it onto the rolls, calling numerous individuals who do not register successfully, asking a series of questions to figure out what was wrong with the person’s registration, and then helping the person correct the application and submit it again. We are implementing the new “chase” program just to assist voters with OVR. This will create additional demands on our time and resources.
10. Even with online voter registration, however, we expect to process significantly fewer voter registration applications than in previous years. With normal canvassing, we processed approximately 2-2.5 applications every hour and over 3,000 applications on average each month.
11. With digital registration, our organizers will spend significantly more time working to contact eligible applicants, direct them to the proper website to complete their registration, and then follow up with them due to the OVR system’s failure to do so. This will result in us processing less applications daily. This special “chase” work, combined with our inability to conduct in-person registration, means we will not meet our intended voter registration goals for the year.

12. Moreover, even when we resume in-person registration, we anticipate that many people will be reluctant to utilize in-person registration because people will not want to hold pens and clipboards or interact face-to-face with our canvassers. Therefore, our voter registration impact will change drastically in the wake of the COVID-19 pandemic. This is why simplified and reliable OVR and enhanced voter education are critical.
13. We anticipate an added burden on our members and others who want to register to vote in the August and November elections. A large problem is that many people in low-income communities and communities of color may not have the technology to register to vote online in their homes. Registering via a paper application with a canvasser was an efficient and reliable means of completing registration.
14. If the person wanted to register online, many could only do so at the local public libraries, which are still closed or limited in capacity. Thus, many people are either currently unable to register because they do not have access to technology or the process is extremely burdensome.
15. The process is extremely burdensome because even when a person can successfully access the OVR system, a person must have a signature on file with the state. The main method of verifying a person's signature is through the Department of Highway Safety and Motor Vehicles, which is now closed.
16. For those that do not have a signature on file, the OVR system will prompt them to print their completed registration application, sign it, and mail it to the county Supervisor of Elections ("SOE"). Many people do not have printers and cannot easily access a printer to submit a signed paper application. They must travel to a retail printing store if they can find one that is still open for business, pay to print the application, and then pay to mail the application. For many people, this process is economically unfeasible and physically tedious even in normal times, but during the current pandemic, it is even harder. Further, the process of printing an application creates a new danger to their health when they must travel to multiple businesses to conduct what the state of

Florida currently considers a non-essential activity. We therefore believe that many people will not attempt to register to vote because the process is too difficult.

17. We also worry that there is a lack of information from the State of Florida to inform voters of the ability to vote-by-mail (“VBM”) and instruct voters on the process for requesting and casting a mail ballot. We have taken on the task of planning trainings and developing educational materials that will instruct voters on how to successfully vote-by-mail. We will spend time and resources creating digital content, sending emails, possibly mailing postcards to members to describe the VBM process. We also plan to spend extra effort meeting with SOEs and ensuring that SOEs disseminate information to voters that is consistent with the information we are providing.
18. In addition to voter education, we are launching a new website to assist our members with requesting a VBM ballot. We paid a contractor an additional \$2,000 to build a separate VBM landing page to which we will route eligible voters who want to vote by mail. The landing page will track the contact information for each user and flag that person for follow up. Our website will then route the person to their county VBM ballot request page. Within 24 hours of the person visiting our landing page, we will do a QC call to confirm whether the person was able to successfully complete the application for a VBM ballot.
19. These VBM quality control calls are being specifically implemented to address the known lack of information that election officials provide to voters on the VBM process. The six people making these calls will be paid per hour that they spend on these calls. If the QC callers learn that a person was unable to successfully complete their request for a VBM application, we will divert more of our resources toward helping them fully complete the VBM request form.
20. Our supporters and members plan to vote in the August and November elections, but there are a multitude of issues created by Florida election officials’ failure to take reasonable election measures in light of the COVID-19 pandemic. These anticipated voting issues create tremendous apprehension and mistrust for our members about casting a ballot in August and November.

21. A major concern of our members is that the election is scheduled during hurricane season and the receipt and return of VBM ballots will be significantly impacted by hurricanes that may hit Florida. Even in the absence of a hurricane, however, members worry that the postal service will not timely or accurately process their VBM ballot for it to arrive on Election Day as currently required. This is why our members need more options like widespread dropboxes and curbside voting.
22. Our members fear that the staff who are counting VBM ballots and conducting signature match may not accurately canvass their ballots if they are improperly trained. Lack of training is an increased risk if staff training is conducted remotely because of social distancing. Our members also worry about whether election officials will notify them in a timely manner if there are issues with their ballot and provide them with enough time to correct deficiencies in their ballots.
23. Our members who live in rural areas have a heightened apprehension regarding voting-by-mail. Their remote location has led them to mistrust the reliability of the postal service and they doubt whether VBM ballots will arrive in time to be counted.
24. Aside from the VBM concerns, many of our members will want to vote in-person both in August and November. For some of our older, African-American members, voting in-person is an important act that is made significant by the ability to go to a polling place, fill out your ballot, and physically turn it in. These members' biggest concern is knowing that SOEs may offer less locations for in-person voting, which will create extremely long lines that run counter to social distancing.
25. Another concern about in-person voting is that when SOEs begin to increase VBM, they cut down on the number of voting locations. I believe that precincts in communities of color will be some of the first polling locations to be cut.
26. For our rural members that want to vote in-person, they fear it will be difficult for them to access a polling place within a reasonable distance of their home. Polling places are often limited in number and far from some communities. Our rural voters have also found that election officials offer less

days for early voting in their area than is offered in urban or suburban areas, thereby removing opportunities for them to social distance by voting early.

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

Signature /s/ Robert Woods

Printed Name Robert Woods

Executed on: May 26, 2020