

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION**

MOVE TEXAS CIVIC FUND;)
JOLT INITIATIVE;)
LEAGUE OF WOMEN VOTERS)
OF TEXAS; and TEXAS STATE)
CONFERENCE OF NAACP UNITS)

Plaintiffs,)

v.)

Case No. 3:19-cv-00041

DAVID WHITLEY, Texas Secretary of State,)
in his official capacity; KEITH INGRAM,)
Texas Director of Elections, in his official)
capacity; CHERYL JOHNSON, Voter)
Registrar for Galveston County, in her official)
capacity; PAMELA OHLENDORF, Elections)
Administrator for Caldwell County, in her)
official capacity; KIRSTEN SPIES, Tax)
Assessor and Voter Registrar for Blanco)
County, in her official capacity; TERRI)
HEFNER, Elections Administrator for Fayette)
County, in her official capacity;)
BETH ROTHERMEL, County Clerk)
and Voter Registrar for Washington County,)
in her official capacity.)

Defendants.)

DECLARATION OF HILLIARD DREW GALLOWAY

My name is Hilliard Drew Galloway. I am over the age of 18 and capable of making this declaration. The facts stated herein are within my personal knowledge.

1. I am the Executive Director of the MOVE Texas Civic Fund (“MOVE”).

2. MOVE is a non-profit organization with its main offices in San Antonio, Texas.
3. MOVE is a grassroots nonpartisan organization that builds power in underrepresented youth communities through civic education, leadership development, and issue advocacy.
4. MOVE conducts voter registration drives in multiple counties across Texas.
5. Our voter registration drives include registering newly naturalized citizens at naturalization ceremonies across the state.
6. At these naturalization ceremonies, paid MOVE employees and MOVE volunteers offer new citizens their first opportunity to register to vote.
7. Registering newly naturalized citizens fits within MOVE's core mission, and having these newly naturalized and registered citizens be forced to face burdens and potential de-registration defeats the purpose of MOVE having expended resources to register them in the first place.
8. When I, and rest of the MOVE team, first heard about the Secretary of State's Advisory, we immediately knew that this was an issue that impacted our organization and our mission, and we began spending time understanding what the Advisory entailed and what actions different counties might be taking in response to the Advisory.

9. The MOVE communications team has had to divert its attention away from its other activities in order to focus on responding to the Secretary of State's actions. This includes using social media and communicating with our press contacts to help ensure the public has accurate information about the Advisory and how counties are responding to the Advisory. MOVE spent time coordinating with several other non-profit organizations to issue letters to the Secretary of State demanding that the Advisories be rescinded and asking for more information on the origin of the advisories.
10. With several special elections for Texas legislative seats currently happening, and with the Texas Legislature in session, having to respond to the Secretary's actions has taken away significant time and focus that the communications team could have been spent bolstering get-out-the-vote efforts or advocating for issues that are being considered at the legislature.
11. MOVE is continuing to monitor the Secretary of State's actions and the counties' actions so that we can update the public and our constituencies with accurate information. This is time that MOVE would otherwise be spending organizing civic engagement opportunities, such as hosting nonpartisan candidate forums and registering voters, and monitoring the Texas Legislature.

12. The MOVE team has begun preparing to distribute accurate voter registration information to its core demographics in order to clear up any confusion that has been created by the Secretary of State's Advisory. This specifically includes distributing information to communities where there are large numbers of naturalized citizens.
13. Since the Advisory was issued, we have received numerous phone calls and social media messages from individuals who are concerned that they might be on the list. We have to spend time responding to each of these individuals and detailing who the list potentially affects and what might happen if they are on the list. Because the lists have not been released to organizations, we have no way of determining if the individuals actually have been targeted.
14. The fallout from the Secretary of State's Advisory has cost MOVE employees many hours of their already thinly stretched time.
15. As we encounter any naturalized citizen registered voters in our normal course of activities who might have been affected by the Secretary of State or county registrars' actions, we have to counsel that voter on what steps may be necessary to remain registered, and, if needed, will have to re-register that voter.
16. We are concerned that these naturalized citizen registered voters will be turned off from civic engagement due to their negative experience with this

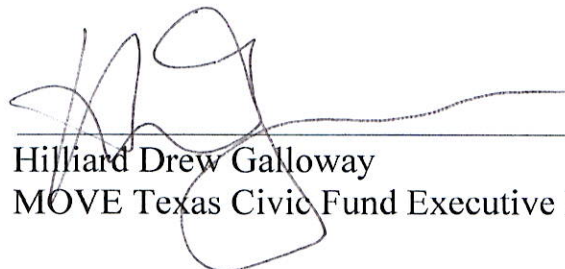
Advisory and the notices that have been sent out based on it, and we will have to spend time and resources ensuring that these registered voters continue to be civically engaged.

17. We are currently spending time formulating how we will respond if the Advisory is not withdrawn. If it is not withdrawn, our organization will need to expend considerable resources identifying which communities were most affected by the lists and attempting to gain access to the list to identify individuals whose registrations are in danger of being cancelled.
18. If we are able to obtain the information of individuals on the list, we will cross-reference it with the internal list of voters that we have registered, including those we registered at naturalization ceremonies, and we will begin taking steps, including direct outreach, to ensure that the voters we helped register remain registered or are re-registered if necessary.
19. This is a particularly busy time for MOVE because there are a number of elections that are happening right now or are about to happen.
20. There is a special election for Texas House District 125. The HD 125 election is happening here in San Antonio, which is our home base. We have been actively registering and educating voters about the election. We co-hosted a nonpartisan candidate forum for the race. Because there are many individuals running for the office, we expect there to be a runoff election,

which means that we will be continuing our focused efforts on this election well into March.

21. In May there are municipal elections here in San Antonio as well as school board races in Hays County which we will be heavily involved in—including registering voters, getting out the vote, and educating voters on the issues, likely including hosting more candidate forums. We also would like to be involved in the Dallas County May municipal elections, but this entirely depends on us having the institutional resources to do so.
22. Any time and money that we spend identifying and assisting voters who are or may be on the purge lists—either by helping them understand the issues, gather required documentation, or, if necessary, re-register—or otherwise responding to the Advisory, will be time and money that we would have spent registering new voters, educating voters on the issues, and helping registered voters successfully get to the polls and cast their ballots.

This Declaration is made pursuant to 28 U.S.C. § 1746. I declare under penalty of perjury that the foregoing is true and correct.



Hilliard Drew Galloway
MOVE Texas Civic Fund Executive Director