

Exhibit 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
BALTIMORE DIVISION**

ASSOCIATION OF COMMUNITY
ORGANIZATIONS FOR REFORM NOW, *ET AL.*,

Plaintiffs,

v.

LISA L. DICKERSON,

Defendant.

Case No. _____

DECLARATION OF SIERRA LETO

1. My name is Sierra Leto. I currently reside at 1901 Swansea Road, Baltimore, MD 21239. I have personal knowledge of the facts stated in this declaration and, if called as a witness, I could and would testify thereto.

2. I am an Office Manager at the Association of Community Organizations for Reform Now (“ACORN”), located at 16 West 25th Street, Baltimore, MD 21218. I have held that position since August 21, 2006. I have been working for ACORN since February 23, 2006.

3. ACORN is the nation’s largest community organization of low- and moderate-income families working together for social justice and stronger communities. Since 1970, ACORN has grown to more than 175,000 member families, organized in 850 member chapters in 75 cities across the United States and other countries.

4. Voter registration is an important part of ACORN’s mission to empower its members and the low- and moderate-income citizens in their communities. With assistance and funding from Project Vote, ACORN organizes voter registration drives, targeting low- and

moderate-income families, including those in Maryland. In its voter registration drives, ACORN workers go into low- and moderate-income minority communities, seek out individuals who are not registered to vote, and help them to register.

5. ACORN and Project Vote's registration drives have been extremely successful. During the 2004 national election cycle, ACORN and Project vote assisted over 1,000,000 people register to vote across the country. In Maryland, ACORN has helped over 30,000 people to register in 2006.

6. While working for ACORN, I was trained by Jeffery Budd, an ACORN community organizer, as a Maryland voter registration volunteer. As part of that training, I received instruction in a variety of tasks, including: how to fill out the Maryland statewide voter registration application completely and accurately, and how to make sure that applicants understand they can either return the voter registration application to the appropriate local board office or they can permit a volunteer to return it under an affidavit that the volunteer signs.

7. Because I believe that a large percentage of bus and subway riders come from low- and moderate-income households, I advise ACORN staff members to solicit voter registrations at Baltimore bus stations, train stations and subway stations operated by Maryland Transit Administration ("MTA"). ACORN staff members, working alone or in small groups of two or three, have engaged MTA customers and solicited voter registrations at or near selected MTA stations in Baltimore for several years.

8. I advise and instruct ACORN staff members to solicit voter registrations in a manner that is polite and not intimidating. I advise and instruct ACORN staff members that the more disruptive and intimidating they become toward potential voters, the fewer voter registrations they are likely to obtain.

9. Soon after March 25, 2006, I learned that MTA police officers had threatened to arrest Jonathan Pezold, a Team Leader for ACORN, for conducting voter registration activities at MTA's Mondawmin Mall Station.

10. Soon after April 11, 2006, I learned that Jonathan Pezold had been confronted by MTA police officers at the Penn North station for attempting to register voters without a free speech permit.

11. On April 20, 2006, Glenn M. Litsinger, Manager of Customer Service for MTA, sent a letter to me, a copy of which is supplied as Attachment A. In that letter, Mr. Litsinger stated that because Jonathan Pezold had attempted to register voters at the Penn North station while waiting for a bus on April 11, 2006, the MTA would issue no more free speech permits to ACORN. Mr. Litsinger also denied all of ACORN's then-pending free speech applications.

12. In addition to voter registration drives, ACORN also distributes leaflets and flyers on a variety of subjects, such as job opportunities and political information, which are important to low- and moderate-income communities. In the past, ACORN has distributed these leaflets and flyers at MTA locations, including the Mondawmin Mall Station and the Penn North Station.

13. As a result of MTA's actions enforcing the MTA Regulation against ACORN, I believe ACORN staff members will be arrested if they solicit voter registrations on MTA property without a free speech permit. Accordingly, I have directed ACORN staff members to register voters at other locations in Baltimore.

14. As a result of MTA's actions enforcing the MTA Regulation against ACORN, I believe ACORN staff members will be arrested if they distribute leaflets and flyers on MTA property without a free speech permit. Accordingly, I have directed ACORN staff members to distribute leaflets and flyers at other locations in Baltimore.

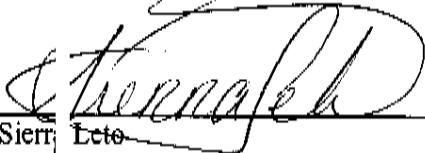
15. As a result of MTA's actions enforcing the MTA Regulation against ACORN, ACORN has been and continues to be deterred from registering voters on MTA property and on public sidewalks in front of MTA stations.

16. As a result of MTA's actions enforcing the MTA Regulation against ACORN, ACORN has been and continues to be deterred from distributing leaflets and flyers on MTA property and on public sidewalks in front of MTA stations.

I declare under penalty of perjury under the laws of the United States of America that the foregoing statements are true and correct to the best of my knowledge, information and belief.

Executed in Baltimore, Maryland on the date specified below.

01/04/07
Date


Sierra Leto