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06-CV-00726-JSR

CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
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MAY 24 2006

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

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WASHINGTON ASSOCIATION OF
CHURCHES, as an organization and
representative of its members; WASHINGTON
ASSOCIATION OF COMMUNITY
ORGANIZATIONS FOR REFORM NOW
(ACORN), as an organization and representative
of its members; ORGANIZATION OF
CHINESE-AMERICANS OF GREATER
SEATTLE, as an organization and representative
of its members; CHINESE INFORMATION &
SERVICE CENTER, as an organization and
representative of its clients; FILIPINO
AMERICAN POLITICAL ACTION GROUP OF
WASHINGTON, as an organization and
representative of its members; KOREAN
AMERICAN VOTERS ALLIANCE, as an
organization and representative of its members;
SERVICE EMPLOYEES INTERNATIONAL
UNION (SEIU) - LOCAL 775, as an
organization and representative of its members;
and WASHINGTON CITIZEN ACTION, as an
organization and representative of its members,

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Plaintiffs,

vs.

SAM REED, in his official capacity as Secretary
of State for the State of Washington,

Defendant.

NO. CV06-0726 RSM

DECLARATION OF
REVEREND JOHN
BOONSTRA IN SUPPORT OF
PLAINTIFFS' MOTION FOR
A PRELIMINARY
INJUNCTION

HILLIS CLARK MARTIN &
PETERSON, P.S.

500 Galland Building, 1221 Second Ave
Seattle WA 98101-2925
206.623.1745; fax 206.623.7789

*Declaration of Reverend John Boonstra In Support
of Plaintiffs' Motion For a Preliminary Injunction
(CV06-0726)-Page 1 of 8*

ORIGINAL

1 Pursuant to 28 U.S.C. § 1746, I, Reverend John Boonstra, hereby declare as follows:

2 1. My name is Reverend John Boonstra. I reside in King County, and I am
3 currently registered to vote in Washington State.

4 2. Since 1989, I have been the Executive Minister of the Washington
5 Association for Churches (the "Association"), a faith-based state public policy education
6 and advocacy network. As Executive Minister, I provide operational and program
7 leadership to the Association, and ensure its financial viability and program vitality.
8

9 3. The Association is a Plaintiff in this matter. This declaration is based on
10 personal knowledge, except where otherwise noted.

11 4. The Association was founded in 1975 as an ecumenical organization serving
12 Washington State; it now embraces approximately 1500 Washington churches, in every
13 county in the state.
14

15 5. The Association comprises 9 affiliated denominations (the African Methodist
16 Episcopal Churches, Pacific Northwest Conference; the American Baptist Churches of the
17 Northwest and the Evergreen Baptist Association of American Baptist Churches USA; the
18 Northwest Region of the Christian Church (Disciples of Christ); the Church of the Brethren,
19 Oregon/Washington District; the Episcopal Church in Western Washington, Diocese of
20 Olympia; the Evangelical Lutheran Church in America, Eastern Washington / North Idaho
21 Synod, Northwest Washington Synod, and Southwestern Washington Synod; the
22 Presbyterian Church (USA), Synod of Alaska Northwest; the United Church of Christ,
23 Pacific Northwest Conference; and the United Methodist Church, Pacific Northwest Annual
24 Conference). In addition, the African Methodist Episcopal Zion Churches, Cascade District,
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1 and the Episcopal Diocese of Spokane are associate members of the Association. The
2 congregations of these member denominations range in size from 50 to 1500 individuals.

3 6. The Association also comprises 13 cooperating ecumenical partners,
4 including the Associated Ministries of Tacoma/Pierce County, the Church Council of
5 Greater Seattle, Church Women United of Washington and Northern Idaho, the Church
6 World Service of the Pacific Northwest Region, the Gorge Ecumenical Ministries, the
7 Greater Vancouver Interfaith Association, the Intercommunity Peace & Justice Center, the
8 Interfaith Association of Snohomish County, the Interfaith Council / Inland Northwest,
9 Interfaith Works of Thurston County, and the Yakima Association of Churches & Faith
10 Communities.
11

12
13 7. Although individual congregants of our affiliated denominational members
14 and partner organizations do not have governance responsibility with respect to Association
15 activities, they do contribute to the Association in order to further its goals.
16

17 8. The Association is committed to building a movement of the faithful in the
18 state of Washington. We organize in faith communities to advocate for, and increase citizen
19 involvement in, faith-based state and federal public policy.
20

21 9. The Association represents the means by which the state ecumenical
22 community communicates faith-based positions to the State legislature and to the federal
23 public policy decision-making process. Involvement in public policy formation and
24 advocacy is central to our understanding of witness to our religious convictions. It is critical
25 to our advocacy efforts and to our ecumenical mission that members of our faith community
26 be empowered to press for action in keeping with our faith-based vision. Voter registration
27 is a crucial component of this process.
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1 10. Though we do not encourage congregants of our member and partner
2 churches to vote for any particular person, we regularly strive to ensure that as many eligible
3 congregants of our member and partner churches as possible are registered to vote.

4 11. This year, as in the past, we plan to encourage eligible congregants to register
5 to vote by sending out action alerts via email and post, by speaking on the importance of
6 registration at events for clergy and the faithful, and by publicizing voter registration on our
7 website. We will also sponsor advocacy days and regular public policy briefings, and we
8 plan to encourage attendees to register to vote as a part of each event. Furthermore, Alice
9 Woldt, the Public Policy Director of the Association, will travel around Washington State
10 this year to promote the importance of voting and voter registration.
11

12 12. In addition, we will actively support other nonprofit nonpartisan groups'
13 registration activity, focusing in particular on groups that facilitate voter registration among
14 low-income individuals and traditionally underrepresented communities.
15

16 13. Moreover, with our active encouragement, many of our 1500 member
17 churches will conduct their own voter registration activity this year, in a wide variety of
18 settings and using a wide variety of methods.
19

20 14. I have reviewed RCW 29A.08.107. I understand that, pursuant to state law,
21 Washington State voters will not be registered to vote if the names, identifying numbers, and
22 other personal information on a voter registration form is not able to be matched with data
23 maintained by the State Department of Licensing or the U.S. Social Security Administration.
24 I understand that "matching" is an unreliable process. It is my firm belief that the risk of
25 disenfranchising eligible congregants as a result of unreliable "matching" procedures is too
26 high.
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*Declaration of Reverend John Boonstra In Support
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1 15. It is my firm belief that many eligible congregants of member denominations
2 and partner organizations who attempt to register in 2006 will not be registered to vote
3 because the Secretary of State is unable to "match" information on their voter registration
4 forms. Even one eligible citizen who is so disenfranchised is too many.

5
6 16. Although the Association does not have the resources to engage in direct
7 services work to assist eligible congregants who are disenfranchised through the "matching"
8 process, the Association will be forced to divert substantial portions of communications and
9 staff time to addressing the issue as best it can. These diverted resources include
10 communications and staff time otherwise earmarked for activities unrelated to voter
11 registration.

12
13 17. Even when this time and resources is diverted from other programs to address
14 the consequences of the "match" process, it is my firm belief that the Association will not be
15 able to ensure that many eligible congregants and contributors who attempt to register in
16 2006 in response to Association exhortation will be registered to vote by the end of the year.

17
18 18. I believe that Washington State's refusal to register eligible citizens for
19 whom the Secretary of State is unable to "match" information to other government databases
20 will result in the disenfranchisement of many congregants whom the Association encourages
21 to register to vote. Many of these congregants will be members of Association
22 denominations, and will be directly harmed by the disenfranchisement. Many of these
23 congregants will have attempted to register through programs sponsored by Association
24 member churches, which will also be harmed by the disenfranchisement.

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26
27 19. Moreover, this disenfranchisement will impede the Association's ability to
28 fulfill its organizational purposes, will frustrate its organizational goals and its efforts to

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I declare under penalty of perjury that the foregoing is true and correct.

Dated: Seattle, WA

5/11, 2006



Reverend John Boonstra

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CERTIFICATE OF SERVICE

I hereby certify that on May 24, 2006, I ~~electronically~~ filed this *Declaration of Reverend John Boonstra* with the Clerk of the Court ~~using the CM/ECF system~~ which will send notification of such filing to the following:

N/A

and I hereby certify that I have sent for service via hand delivered by legal messenger to be served on May 25, 2006 this document to the following non CM/ECF participants:

Sam Reed, Secretary of State, State of Washington
Legislative Building
Olympia, WA 98504-0220

Rob McKenna, Attorney General for the State of Washington
Office of the Attorney General
1125 Washington Street SE
Olympia, WA 98504-0100

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED this 24th day of May, 2006 at Seattle, Washington.

/s/ Sarah A. Dunne / Sarah A. Dunne
Sarah A. Dunne, WSBA #34869

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