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CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
BY DEPUTY



06-CV-00726-MAN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

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,

Plaintiffs,

vs.

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

Defendant.

NO. CV06-0726 RSM

DECLARATION OF  
ADAM GLICKMAN IN  
SUPPORT OF PLAINTIFFS'  
MOTION FOR A  
PRELIMINARY INJUNCTION

*Declaration of Adam Glickman In Support of  
Plaintiffs' Motion For a Preliminary Injunction  
(CV06-0726)-Page 1 of 7*

HILLIS CLARK MARTIN &  
PETERSON, P.S.

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

**ORIGINAL**

1 Pursuant to 28 U.S.C. § 1746, I, Adam Glickman, hereby declare as follows:

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

4 2. I am the Assistant to the President for Politics and Strategic Communications  
5 at the Service Employees International Union, Local 775 ("Local 775"). In that capacity, I  
6 am responsible for Local 775's activities in electoral politics, media outreach, internal  
7 member communications, and public campaign strategy and communications. I am also  
8 responsible for producing and supervising Local 775's communications materials pertaining  
9 to voter registration. I am fully familiar with, and have personal knowledge of, Local 775's  
10 organizational structure and mission and its voter registration and mobilization program in  
11 Washington State.  
12

13 3. Local 775 is a plaintiff in this matter. This declaration is based on personal  
14 knowledge, except where otherwise noted.  
15

16 4. Local 775 is a non-profit union of long-term care workers in Washington  
17 State. We represent 28,000 home care and nursing home workers throughout the state, with  
18 members in every county. Our mission is to unite the strength of all long-term care  
19 workers, to improve the lives of working people and lead the way to a more just and humane  
20 world.  
21

22 5. Local 775 maintains offices in Bremerton, Olympia, Pasco, Seattle, Spokane,  
23 Vancouver, and Wenatchee.  
24

25 6. Local 775 is a Washington State local affiliate of the Service Employees  
26 International Union ("SEIU"), which is an organization of more than 1.8 million members,  
27 and the largest union of long-term care workers in the United States.  
28

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1           7.     Local 775 advocates within Washington State on behalf of its members. It is  
2 vital to the success of Local 775's advocacy efforts that as many members as possible are  
3 registered to vote. Consequently, Local 775 actively engages in extensive voter registration  
4 efforts. Local 775 currently employs 43 full-time staff members; 14 of these staff members  
5 – 1/3 of our full-time staff -- devote substantial portions of their time to these voter  
6 registration efforts.  
7

8           8.     For example, Local 775 regularly registers voters at meetings and events in  
9 which it is a participant, sponsor, or host. Local 775 includes a voter registration form in an  
10 orientation kit that it seeks to distribute to new members when they are hired for a new  
11 position. Local 775 regularly mails educational materials to members encouraging them to  
12 register to vote. Local 775 devotes substantial organizational resources to these voter  
13 registration efforts.  
14

15           9.     In addition, Local 775 regularly conducts voter registration drives for the  
16 general public, and devotes substantial organizational resources to such voter registration  
17 drives.  
18

19           10.    In the last five years, Local 775 has registered approximately 3,000 long-term  
20 care workers.  
21

22           11.    Local 775 is currently engaging in voter registration efforts in Washington  
23 State. Sending orientation kits, active canvass now to new members(including voter  
24 registration). Activity will increase as year progresses, including a number of mailings to  
25 nonregistered members in July and August.  
26

27           12.    Local 775 has earmarked \$10,000 of its budget for fiscal year 2006 for the  
28 voter registration activities above.

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1 13. Currently, approximately 60-65% of Local 775 members are registered to  
2 vote. As an organizational goal, Local 775 will strive to ensure that 75% of its members are  
3 registered to vote by the end of 2006, and that 80% of its members are registered to vote by  
4 the end of 2007.

5 14. I have reviewed RCW 29A.08.107. I understand that, pursuant to state law,  
6 Washington State voters will not be registered to vote if the names, identifying numbers, and  
7 other personal information on voter registration forms are not able to be matched with data  
8 maintained by the State Department of Licensing or the U.S. Social Security Administration.  
9 I understand that "matching" is an unreliable process, that has, in similar circumstances,  
10 yielded error rates of 20-30%.

11 15. It is my firm belief, based on my work for Local 775, that many eligible  
12 members and non-members whom Local 775 attempts to register in 2006 will not be  
13 registered to vote because the Secretary of State is unable to "match" information on their  
14 voter registration forms.

15 16. It is my firm belief that eligible members of Local 775 will be harmed when  
16 the Secretary of State is unable to "match" information on their voter registration forms and  
17 they are barred from registering as a result. It is my firm belief that despite these eligible  
18 members' desire to vote in the September 19, 2006, primary election or the November 7,  
19 2006, general election, they will be unable to cast a valid vote.

20 17. In addition, it is my firm belief that Local 775 will be forced to divert  
21 substantial time and resources to assist eligible applicants in correcting errors with the  
22 "match" process, including funds earmarked for other voter registration activities and funds  
23 earmarked for other activities unrelated to voter registration.

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1 18. Even when this time and resources is diverted from other programs to correct  
2 errors with the "match" process, it is my firm belief that because of failures in the "match"  
3 process, Local 775 will not be able to ensure that many eligible members and non-members  
4 whom Local 775 attempts to register in 2006 will be registered to vote in time to vote a  
5 ballot that will be counted in the September 19, 2006, primary election or the November 7,  
6 2006, general election.  
7

8 19. I believe that Washington State's refusal to register eligible citizens for  
9 whom the Secretary of State is unable to "match" information to other government databases  
10 will result in the disenfranchisement of many citizens whom Local 775 has attempted to  
11 assist in registering to vote. Many of these citizens will be Local 775 members, who will be  
12 directly harmed by the disenfranchisement. Moreover, this disenfranchisement will impede  
13 Local 775's ability to fulfill its organizational purposes, will frustrate its organizational  
14 goals and its efforts to advocate on its members' behalf, and will render Local 775 time and  
15 resources spent on voter registration completely useless.  
16  
17

18 20. If Washington State is not enjoined from refusing to register voters whose  
19 information cannot be "matched," Local 775 members will suffer harm, and Local 775 will  
20 suffer harm as an organization, as the voters of this state are disenfranchised. For this  
21 reason, we respectfully request that this court grant the relief we so urgently need.  
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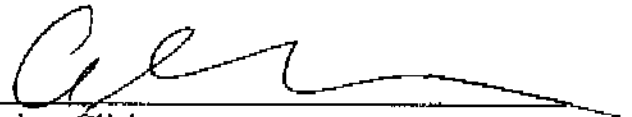
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I declare under penalty of perjury that the foregoing is true and correct.

Dated: 6/20/06 <sup>Sally</sup>, WA  
5/14, 2006

  
Adam Glickman

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 24, 2006, I ~~electronically~~ filed this *Declaration of Adam Glickman* 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 24<sup>th</sup> day of May, 2006 at Seattle, Washington.

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

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