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CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
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06-CV-00726-DECL

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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
JOHN JONES IN SUPPORT
OF PLAINTIFFS' MOTION
FOR A PRELIMINARY
INJUNCTION

HILLIS CLARK MARTIN &
PETERSON, P.S.

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*Declaration of John Jones In Support of Plaintiffs'
Motion for a Preliminary Injunction(CV06-0726)
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ORIGINAL

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

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

4 2. I am the Chairman of the Washington chapter of the Association of
5 Community Organizations for Reform Now ("ACORN"). In that capacity, I am responsible
6 for the development of the organization's national agenda and its implementation in
7 Washington; this agenda encompasses education, voting rights, tenant rights, living wage
8 issues, and social services, among others. I am fully familiar with, and have personal
9 knowledge of, Washington ACORN's organizational structure and its voter registration and
10 mobilization program in Washington State.

11 3. Washington ACORN is a plaintiff in this matter. This declaration is based on
12 personal knowledge, except where otherwise noted.

13 4. Washington ACORN is a statewide community organization with
14 headquarters in Burien, WA. Our mission is to organize low- and moderate-income
15 families, and to work for social justice, better neighborhoods, and stronger communities.

16 5. Over 2,100 families in the Seattle area – in southern King County, Burien,
17 Sea-Tac, and the Pac Highway area – are full members of Washington ACORN, and pay a
18 monthly membership fee. We also serve an even larger constituency of non-dues-paying
19 provisional members. Our members are often low- and moderate-income families and
20 people of color.

21 6. Washington ACORN is a member of the national ACORN network, the
22 nation's largest community organization of low- and moderate-income families, with more
23 than 175,000 member families in more than 850 neighborhood chapters. The national

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1 ACORN network has affiliates in 37 states and the District of Columbia. Washington

2 ACORN board members sit on the national ACORN board of directors.

3 7. Washington ACORN advocates within Washington State on behalf of its
4 members. Our goal is to empower our members so that they are able to make an impact on
5 their communities. Our strength as an organization depends on our members' involvement,
6 and it is therefore vital to the success of Washington ACORN's mission that as many
7 members as possible are registered to vote. Thus, we consider voter registration efforts a
8 major part of our work. We devote considerable efforts to voter registration of both our
9 members and the general public.

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12 8. Approximately one-quarter of Washington ACORN work involves voter
13 registration and mobilization. We actively assist our members in registering to vote. We
14 also make a point of reaching out to assist individuals who are not Washington ACORN
15 members, but who live in the communities in which we work, in registering to vote.

16
17 9. In 2004, Washington ACORN staff conducted extensive door-to-door
18 registration as well as site-based registration. During the six months leading up to Election
19 Day, we employed ten people to engage in voter registration full-time. In total, we
20 registered 35,000 voters in 2004 in the King County and Pierce County areas.

21
22 10. Washington ACORN is currently seeking dedicated funding for a large voter
23 registration effort to begin in the summer of 2006. Our total voter registration goals will
24 depend on the level of funding we are able to secure. Nevertheless, even if we are not
25 successful in obtaining this particular dedicated funding, we will continue to actively assist
26 citizens in registering to vote in 2006. For example, as in previous years, we will encourage
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1 members to register to vote in Washington ACORN communications. We will also continue
2 to make registration materials available at Washington ACORN meetings.

3 11. Even without the additional dedicated funding in paragraph 10, Washington
4 ACORN plans to register between 2,000 and 10,000 voters in 2006.

5 12. 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 a voter registration form are not able to be "matched" with
8 data maintained by the State Department of Licensing or the U.S. Social Security
9 Administration. I understand that "matching" is an unreliable process, which has, in similar
10 circumstances, yielded error rates of 20-30%.

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

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

20 15. In addition, it is my firm belief that Washington ACORN will be forced to
21 divert 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 activities unrelated to voter registration.

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1 16. 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 Washington ACORN will not be
3 able to ensure that many eligible members and non-members whom we attempt to register in
4 2006 will be registered to vote by the end of the year.

5 17. In addition, I am concerned that there will be a higher incidence of failed
6 "matches" among people of low income and people of color. This would especially affect
7 Washington ACORN's goals and activities because much of our membership and voter
8 registration activity focuses on these groups.

9 18. I believe that Washington State's refusal to register eligible citizens for
10 whom the Secretary of State is unable to "match" information to other government databases
11 will result in the disenfranchisement of many citizens whom Washington ACORN has
12 attempted and will attempt to assist in registering to vote. Many of these citizens will be
13 Washington ACORN members, who will be directly harmed by the disenfranchisement.

14 19. Moreover, this disenfranchisement will impede Washington ACORN's
15 ability to fulfill its organizational purposes, will frustrate Washington ACORN's
16 organizational goals and its efforts to advocate on its members' behalf, and will render time
17 and resources spent on voter registration completely useless.

18 20. If Washington State is not enjoined from refusing to register voters whose
19 information cannot be "matched," Washington ACORN members will suffer harm, and
20 Washington ACORN will suffer harm, as the voters of this state are disenfranchised. For
21 this reason, we respectfully request that this court grant the relief we so urgently need.

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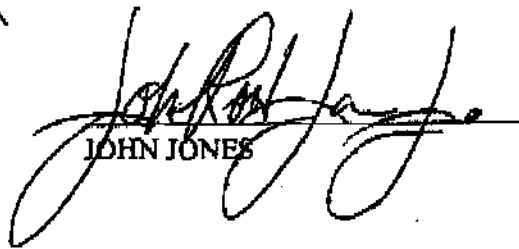
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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this Declaration was executed on May 24, 2006 in Seattle Washington



JOHN JONES

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CERTIFICATE OF SERVICE

I hereby certify that on May 24, 2006, I ~~electronically~~ filed this *Declaration of John Jones* 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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