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

FILED
MAY 24 2006

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

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

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
DEANA KNUTSEN IN
SUPPORT OF PLAINTIFFS'
MOTION FOR A
PRELIMINARY INJUNCTION

HILLIS CLARK MARTIN &
PETERSON, P.S.

500 Galland Building, 1221 Second Ave
Seattle WA 98101-2926
206.623.1745; fax 206.623.7789

Declaration of Deana Knutsen CV06-0726 -
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ORIGINAL

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

2 1. My name is Deana Knutsen. I reside in Snohomish County, and I am
3 currently registered to vote in Washington State.

4 2. I am the Chair of the Board of Directors of Washington Citizen Action
5 ("WCA"). In that capacity, I am responsible for the development and implementation of the
6 organization's program, including facilitating its planning process, meeting its annual goals,
7 and supervising all organizing, leadership development, and political and public awareness
8 activities. I have overall responsibility for the development of and adherence to the
9 organizational budget as well as development and implementation of a fundraising strategy
10 for the organization that includes grants, major donors, and grassroots donations. I am fully
11 familiar with, and have personal knowledge of, Washington Citizen Action's organizational
12 structure and its voter registration and mobilization program in Washington State.

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

15 4. WCA is a statewide, grassroots lobbying organization with headquarters in
16 Seattle. With over 50,000 dues-paying members, we are the largest consumer advocacy
17 group in the state. Our mission is to achieve economic fairness in order to establish a
18 democratic society characterized by racial and social justice for those who reside in
19 Washington State.

20 5. WCA is a dues-paying member organization of US Action, a national
21 organization with chapters in 25 states.

22 6. WCA advocates within Washington State on behalf of our members. Our
23 strength as an organization depends on our members' involvement. Our advocacy ability, as

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1 well as our credibility, is strengthened when our members are registered voters. Therefore,
2 voter registration is critical to the achievement of our mission.

3 7. WCA devotes considerable efforts to voter registration of both members and
4 the general public. For example, as part of our Voter Registration Canvass, our staff
5 conducts door-to-door voter registration and membership drives among Washington
6 households. We also canvass members by phone and encourage them to register to vote; for
7 those who indicate that they are interested in registering, we subsequently mail out
8 individual voter registration forms. In addition, WCA conducts voter registration at
9 naturalization ceremonies, to ensure that new citizens are able to exercise the right to vote.
10 WCA has also assisted with voter registration by distributing forms, informing citizens
11 about the process by which they may register, and assisting individuals in completing
12 individual voter registration forms, at hundreds of public sites.

13 8. In 2004, WCA directly registered 54,695 Washington citizens to vote. I
14 understand that this represents more than 10% of all registration forms processed in 2004
15 throughout Washington State.

16 9. In 2004, 42 of 214 employees were dedicated full-time to our Voter
17 Registration Canvass. Our budget for the Voter Registration Canvass was \$224,821 –
18 including dedicated staff time, transportation, and materials. Moreover, additional staff and
19 volunteer time beyond the dedicated budget above was also devoted to assisting with our
20 voter registration efforts.

21 10. We are in the process of creating our voter registration plan for 2006. We are
22 currently seeking additional dedicated funding for voter registration efforts; our total voter
23 registration goals will depend on the level of funding we amass. However, even if we do not
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1 receive this additional dedicated funding, we will engage in extensive voter registration
2 efforts this year. We are projecting that, even with minimal dedicated funding, we will
3 attempt to register 17,000 eligible voters in 2006.

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

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

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

19 14. As a result, it is my firm belief that WCA will be forced to divert substantial
20 time and resources to assist eligible applicants in correcting errors with the "match" process,
21 including funds earmarked for other voter registration activities and funds earmarked for
22 activities unrelated to voter registration.

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

7 16. In addition, I am concerned that there will be a higher incidence of failed
8 "matches" among people of low income and people of color. This would especially affect
9 our goals and activities since much of our membership and voter registration activity focuses
10 on these groups.
11

12 17. I believe that Washington State's refusal to register eligible citizens for
13 whom the Secretary of State is unable to "match" information to other government databases
14 will result in the disenfranchisement of many citizens whom WCA has attempted to assist in
15 registering to vote. Many of these citizens will be WCA members, who will be directly
16 harmed by the disenfranchisement.
17

18 18. Moreover, this disenfranchisement will impede WCA's ability to fulfill its
19 organizational purposes, will frustrate WCA's organizational goals and its efforts to
20 advocate on its members' behalf, and will render WCA time and resources spent on voter
21 registration useless.
22

23 19. If Washington State is not enjoined from refusing to register voters whose
24 information cannot be "matched," WCA members will suffer harm, and WCA will suffer
25 harm, as the voters of this state are disenfranchised. For this reason, we respectfully request
26 that this court grant the relief we so urgently need.
27
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* * *

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

Dated: Seattle, WA

May 18

_____, 2006

Deana Knutsen

Deana Knutsen

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CERTIFICATE OF SERVICE

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