IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

LEAGUE OF WOMEN VOTERS OF OHIO,

Plaintiff,

v.

FRANK LAROSE, in his official capacity as
Secretary of State of Ohio,

Defendant.

CASE NO. 2:20-cv-1638

JUDGE MICHAEL H. WATSON
Magistrate Judge Elizabeth Preston Deavers

DECLARATION OF MOLLY KATHERINE SHACK
(pursuant to 28 U.S.C. § 1746)

I, Molly Katherine Shack, am over the age of 18 and fully competent to make this declaration. I declare the following:

Personal Background

1. I am 30 years old.

2. I have lived in Columbus, Ohio, my entire life.

3. I am the Co-Executive Director of Ohio Organizing Collaborative (“OOC”). I have served in this role since October, 2019, and have worked at OOC since July 2012 as a communications staffer, community organizer and civic engagement director.

The Ohio Organizing Collaborative

4. Founded in 2007, OOC is a non-partisan, non-profit that leads a coalition of Ohio-based organizations, including community organizations, faith-based institutions, and policy groups.
5. OOC spearheads progressive policy campaigns throughout Ohio, including criminal justice reform, access to education, voting rights and environmental justice projects. OOC pursues its policy goals through many activities, including community organizing, voter-registration drives, grassroots voter education programs, legislative advocacy and statewide ballot initiatives.

6. OOC also develops local community leaders to organize their communities. OOC has trained over 800 community leaders and activists in its week-long organizing program.

7. OOC is the largest voter registration organization in Ohio and a recognized state leader in non-partisan electoral work. Since 2012, OOC organizers have registered more than 390,000 Ohioans to vote. By the end of 2020, OOC aims to have registered 500,000 voters.

8. One of the OOC member organizations is Ohio Student Association, which has college campus chapters across Ohio and works on a range of public policy issues, including access to higher education, student loan debt, and criminal justice reform.

**OOC’s 2020 Voter Registration Efforts**

9. In its 2020 budget, OOC allocated $1,500,000 to conduct voter registration through its field vendor between January 1 and April 30, 2020.

10. On February 19, 2020, the canvassing program began registering voters across Ohio. Canvassers were recruited, hired, trained in voter registration and dispersed to help register voters in historically underrepresented communities of color. Canvassers focused their registration efforts on community “hotspots,” such as libraries, grocery
stores, and public parks. Canvassing staff are paid fifteen dollars or more depending on their experience and level of seniority.

11. In total, 26 staff—including a program director, 2 regional field deputies, 3 canvass directors, 16 canvassers, a quality control director and 3 quality control coordinators—ran the registration campaign across the Cleveland, Columbus, and Cincinnati metropolitan communities.

12. Between February 19, 2020, and March 13, 2020, OOC helped register 2,233 voters in these three metropolitan areas through its field vendor.

13. Canvassers ask community members if they are registered to vote at their current address. If they are not, canvassers guide registrants in writing the necessary information on a voter registration form, and ensure each registrant signs their respective form. These forms are submitted to a quality control team who make a copy of the form for OOC’s records, record the form’s data in a proprietary database, and then submit the original, hardcopy forms to the appropriate county Board of Election.

14. OOC maintains a rigorous quality-control program to ensure it submits accurate, valid registration forms. This process includes randomly selecting hundreds of forms from a given drive and contacting registrants to ensure the information recorded is accurate.

15. OOC found very few issues during its quality-control review of the 2,233 voter registration forms it collected between February 19 and March 13, 2020.
16. OOC had planned to continue the voter registration operation through the summer, but had to stop its field registration on March 13, 2020, in response to the COVID-19 pandemic.

**Ohio Voter Registration Applications Submitted After February 18, 2020**

17. Ohio’s primary election was initially set for March 17, 2020, but Ohio closed its polling places the evening before the election due to concerns about the spread of COVID-19.

18. On March 25, 2020, the Ohio Legislature passed a coronavirus relief bill that, among other things, set the primary date for April 28, 2020.

19. OOC understands that the bill also prohibits county Boards of Elections from processing voter registration forms submitted after February 18, 2020—the voter registration deadline for the March 17, 2020, election date.

20. This means that a majority of the 2,233 voters OOC helped register between February 19, 2020, and March 13, 2020, likely will not be able to vote in the primary set for April 28, 2020, if elections officials do not process these registrations.

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


Molly Katherine Shack