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 ROBERT FLANAGAN MOORE
(pursuant to 28 U.S.C. § 1746)

I, Robert Flanagan Moore, 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 and a qualified and registered Ohio voter.

2. I grew up in Bexley, Ohio, and attended Denison University in Granville, Ohio.

3. After college, I worked as a AmeriCorps community organizer and a public health analyst in Omaha, Nebraska, and then studied at the University of California, Berkeley, where I received a Master of Public Policy.

4. After graduate school, I returned to Ohio in 2017 and have lived here since.

6. I currently reside at 34 West Kossuth Street, Columbus, Ohio and have been registered to vote at this address since 2019.

7. I own and run Scioto Analysis, an Ohio-based public-policy analysis company that conducts tax, budget, social safety-net and economic analysis for state and local governments across the county.

The 2020 Primary Election

8. I planned to vote in person in Ohio’s primary on March 17, 2020. Since returning to Ohio in 2017, I have always voted in-person.

9. The primary includes a local bond issue for funding Columbus State Community College. Beyond having a say in the federal primary, I am particularly invested in helping decide how we fund our local higher education institutions.

10. After the election was postponed, I learned that the state legislature had passed a law moving the election date, making it vote-by-mail only, and requiring everyone to apply for a mail absentee ballot in order to receive a ballot.

11. I learned that I would need to submit a mail absentee ballot application in writing, and that electronic submission was not possible.

12. I have not owned a printer in over a decade. When I have to sign documents—including business contracts—I sign them electronically. In the rare event that I must provide a printed, hard-copy document, I print it at my local library.

13. When I learned I would need a printed application, I went to my local library’s website, https://www.columbuslibrary.org/, which informed me that all libraries would be closed until “at least” April 6, 2020, because of COVID-19.
14. I do not own a car, and the physical Franklin County Board of Elections (“BOE”) office is over 10 miles from my house. I am afraid to take public transit because of the COVID-19 pandemic. I do not want to risk infection myself, nor risk unwittingly infecting others. As a result, going to the BOE office to pick up an application is not feasible for me.

15. On March 26, 2020, I called the BOE to ask how to seek an absentee ballot without submitting a printed application. I immediately heard an automated audio recording, on loop, providing information about the BOE, but I never heard any option to speak with an official or leave a voicemail. After listening to the loop once and without prompting, I pressed “0,” hoping for an operator. Instead, the system placed me on hold.

16. After about 10 minutes on hold, a BOE representative picked up. I told him that I wanted to request an absentee ballot application be sent to me and he forwarded my phone call to an automated system that receives absentee ballot application requests. That system requested the last four digits of my social-security number, my date of birth, and my address. After I entered this information, the automated system informed me that it would send me my absentee ballot application to the address already on file. It did not confirm which address was on file.

17. In total, I spent about 15 minutes on the phone trying to request an absentee ballot application.

18. I then looked up my voter registration online and confirmed that the address associated with my registration is my current residence.
19. I share the same first and last names as my father—Robert Moore—which causes the
United States Postal Service to occasionally deliver his mail to me, or my mail to
him. I worry that even if the Board of Elections has the correct address, the Postal
Service might deliver my absentee ballot application—or, later, my actual absentee
ballot—to my father instead of me.

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


_________________________________________
Robert Flanagan Moore