IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF FLORIDA
TALLAHASSEE DIVISION

DREAM DEFENDERS, et al.,

Plaintiffs,

v.

LAUREL M. LEE, et al.,

Defendants.

Case No. 1:20-cv-67-RH-GRJ
Judge Robert L. Hinkle

KIRK NIELSEN, et al.,

Plaintiffs,

v.

LAUREL M. LEE, et al.,

Defendants.

Case No. 4:20-cv-236-RH-MJF
Judge Robert L. Hinkle

DECLARATION OF PAMELA CATALDO
(pursuant to 28 U.S.C. § 1746)

I, Pamela Cataldo, am over the age of 18 and fully competent to make this declaration. I declare the following:

Personal Background
1. I am 35 years old.

2. I have lived in Massachusetts since 1999.

3. I am a native, fluent Spanish speaker.

4. I am a Paralegal and Field Investigator at Demos. I have served in this role since May 2012, and have worked as a Paralegal since February 2010.

5. During my paralegal career, I have done certified translations of declarations, evidence and documents connected to different matters. I have over 10 years of translation and interpretation experience.

6. On June 22, 2020, I reviewed the Broward County’s SOE’s website, https://www.browardsoe.org. The website is in English and provides partial translation to Spanish through Google Translate. The SOE does not provide a full, human-generated Spanish website that is equivalent to the English website.

7. The Broward SOE’s website contains a webpage about Florida’s Amendment Four, https://www.browardsoe.org/Voter-Information/Learn-about-Amendment-4, which lists “two documents that can further assist Floridians with felony convictions with the process of registering to vote.” These two documents are “Standards governing eligibility to vote after a felony conviction” and “Request
for an Advisory Opinion.” A true and correct version of each document is attached as Exhibit 1 and Exhibit 2, respectively.

8. Both documents are provided as PDFs only in English. The Google Translate function applied to the rest of the website does not translate them.

9. The Broward County SOE provides an online vote-by-mail ballot request service at https://www.browardsoe.org/Voting-Methods/Vote-By-Mail-Voting/Absentee-Ballot-Request-Form. The form appears to only be available in English or through Google Translate for Spanish.

10. Based on my review of other counties’ websites, many counties appear to use a vote-by-mail request function that is identical to the one used by the Broward SOE. For example, the SOE websites of Seminole County, Osceola County, Lee County, Hardee County, Hendry County, and Polk County all appear to use the same service for allowing vote-by-mail requests to be submitted online as Broward County.

11. In or around June 2020, a voter in Seminole County went through the process of requesting a mail ballot using this service, translated via Google Translate, on his phone. The voter made screenshots at each step in the process and sent them to counsel for the Dream Defenders’ Plaintiffs. A true and correct copy of the screen screenshots provided by the Seminole county voter of the vote-by-
mail request process is attached as Exhibit 3, with the voter’s personal information redacted.

12. I have reviewed the screenshots of the vote by mail request process, and consistent with my past experience with Google Translate, the machine-translated vote-by-mail request form does not provide an easily understood and clear translation of its instructions.

13. For example, one page of the process, shown at page 6 of exhibit 3 contains large paragraphs of instructions translated with Google Translate. These instructions concern how a voter can request the vote-by-mail ballot for all the elections for the period encompassing the next two general elections that the voter is eligible for, and they are very confusing. I had to read the last sentence of the first paragraph a few times to understand it. This type of language would be very hard to understand for someone who does not have a background in voting rights, a knowledge of English, or experience in translation.

14. In my experience, this is an extremely common problem with Google Translate and it exists throughout the text I reviewed. I understood enough to understand the process but it does not reflect how people speak and it is not the kind of simple language that is needed to make the information accessible to all Spanish speakers.
15. In my experience, Google Translate is a tool to give you an idea of what is in the text, but it does not provide a precise or natural translation. The long, sometimes repetitive sentences produced by Google Translate may be confusing for some readers who only speak Spanish.


17. On that Profile, I found a tweet dated 11:30 AM on March 17, 2020, which read: “Attention: While nearly all precincts will be open and operating normally, we have had 16 polling places relocated in the past few days. To find out if your precinct has moved, visit http://BrowardSOE.org. The change of precinct information is on the home page.” This tweet is available at https://twitter.com/BrowardVotes/status/1239937032996044800, and a true and correct copy of this tweet is attached as Exhibit 4. This document was produced to Defendants under Bates Number DD-000000249.

18. Based on my review of the Broward County SOE’s Twitter account, the Broward SOE provides a substantial amount of information to voters via Twitter. All of the Tweets I saw on the Broward SOE’s Twitter profile were entirely in English. The Broward SOE does not appear to operate a separate Spanish-language Twitter profile.

B. Hardee County
19. On June 22, 2020, I reviewed the Hardee County’s SOE’s website, https://www.hardeecountyelections.com/. The website is in English and provides partial translation to Spanish through Google Translate. The SOE does not provide a full, human-generated Spanish equivalent website.


21. On that home page, I selected the Spanish google translate option and then clicked the Spanish equivalents of the link above, by navigating to “Voto por ausencia” and then clicking “Firma en su boleta de votacion en ausencia,” but this brought me to the same, English-only PDF attached as Exhibit 5. True and correct screenshots of the English and Google Translate Spanish views of the menu path to that PDF are attached as Exhibit 6.

C. Hendry County

22. On June 22, 2020, I reviewed the Hendry County’s SOE’s website, https://www.hendryelections.org/. The website is in English and provides partial
translation to Spanish through Google Translate. The SOE does not provide a full, human-generated Spanish equivalent website.

23. That site contains a page listing 2020 public notices, https://www.hendryelections.org/-NOTICES-/2020. A true and correct copy of this page is attached as Exhibit 7 and was produced to Defendants under Bates No. DD-0000000269.

24. That notices page includes a notice tilted “Hendry County Supervisor of Elections Provides COVID-19 Update,” at https://www.hendryelections.org/Portals/Hendry/Documents/Notice%20of%20Closure.pdf?ver=2020-05-01-183612-203. That notice is provided only in English and states that the SOE’s offices will allow “only limited public access to the building” “out of an abundance of caution” starting on “March 23, 2020,” and directs citizens to conduct voting-related tasks online or via phone or email.

25. A true and correct copy of the Notice of Closing from the Hendry County SOE’s website is attached as Exhibit 8. This Document was produced to Defendants under Bates Number DD-000000264.

27. Based on my review, the Hendry County SOE provides a substantial amount of timely information to voters via Facebook. However, the Hendry County SOE’s Facebook Profile overwhelmingly contains English-language content with no Spanish equivalent. In fact, only a single recent post,
https://www.facebook.com/258668940979314/photos/pcb.1508350336011162/1508350152677847/?type=3&theater, appears to contain content in both Spanish and English.

28. More common are posts like the Hendry County SOE’s April 20, 2020 post, found at
https://www.facebook.com/258668940979314/photos/a.259605550885653/1476004851912814/. This post recommends voters seek a vote-by-mail ballot because the SOE is “not yet sure where we will be with the COVID 19 Virus come August or November.” A true and correct screenshot of the Hendry County SOE’s April 20 Facebook Post, taken on June 21, 2020, is attached at Exhibit 10.

D. Lee County

29. On June 22, 2020, I reviewed the Lee County’s SOE’s website, https://www.lee.vote/. The website is in English and provides partial translation to Spanish through Google Translate. The SOE does not provide a full, human-generated Spanish equivalent website.
30. Under the “Election Information” tab on the left-hand side of the main page, the main page’s menu includes an option titled “Early Voting Information,” [https://www.lee.vote/Election-Information/Early-Voting-Information](https://www.lee.vote/Election-Information/Early-Voting-Information). When translated to Spanish by Google Translate, this menu option becomes “Información de votación anticipada,” a literal translation that, in Spanish, reads as “anticipated vote information.”

31. The Lee County SOE website also provides a “Public Notices” page, [https://www.lee.vote/Election-Information/Public-Notices](https://www.lee.vote/Election-Information/Public-Notices). A true and correct copy of that page is provided as Exhibit 11. This Document was produced to Defendants under Bates Number DD-0000000247.

32. Although this page lists various notices and provides text “English PDF” and “Spanish PDF” or “Español PDF” below the notice listed, only the “English PDF” text actually links to a PDF. The page does not provide any links to any Spanish-language PDFs.

33. For example, the “Canvassing Board Meetings and Logic and Accuracy Testing Schedule[s]” for August 18, 2020, and November 3, 2020, Elections are each provided in English but not Spanish. A true and correct copy of each notice is attached as Exhibit 12 and Exhibit 13. These documents were produced to Defendants under Bates Numbers DD-000000251 and DD-000000268, respectively.
34. On or around June 21, 2020, I visited what appears to be the Lee County SOE’s Twitter account. Based on my review of the Lee County SOE’s Twitter account, the Lee SOE provides a substantial amount of information to voters via Twitter. However, the Lee County SOE’s Twitter account, https://twitter.com/Lee_Elections/, appears to contain tweets written only in English. The Lee County SOE does not appear to operate a separate Spanish-language Twitter profile.

35. At 10:43 AM on June 4, 2020, that account tweeted, “The August 18 Primary Election is quickly approaching! The deadline to register to vote or change your party affiliation is Monday, July 20, 2020. Head to https://registertovoteflorida.gov to register today! For questions or concerns, call our office at (239) 533-8683.”

36. This tweet can be found at https://twitter.com/Lee_Elections/status/1268554023910756361. A true and correct copy of that tweet is provided as Exhibit 14, and was produced to Defendants under Bates No. DD-000000266.

E. Osceola County

38. A true and correct screenshot of the Spanish-language home page is provided as Exhibit 15. This Document was produced to Defendants under Bates Number DD-000000250.

39. The Spanish version of the Osceola SOE’s website home page lists some links in English, not Spanish: “View our calendar,” “Vote by Mail Cure Affidavit,” and “Provisional Ballot Cure Affidavit.”

40. In addition, the “Provisional Ballot Cure Affidavit” link on the Spanish home page directs to an English-only webpage, “Provisional Ballot Cure Affidavit,” https://www.voteosceola.com/en-us/How-to-Vote/Vote-a-Provisional-Ballot/Provisional-Ballot-Cure-Affidavit, which in turn provides a link to an English-only PDF entitled “Provisional Ballot Cure Affidavit – Instructions and Form” form at https://www.voteosceola.com/Portals/Osceola/Documents/Provisional%20Ballot%20Cure%20Affidavit2.pdf?ver=2020-03-06-194106-953.

41. A true and correct copy of that form is provided as Exhibit 16. This Document was produced to Defendants under Bates Number DD-000000271.

42. The website nowhere provides that particular form in Spanish.

43. Although most of the Osceola SOE’s website is available in a professionally translated Spanish version, the online vote-by-mail request service
is provided through the same service used by Broward and other counties, which is available in Spanish only through Google Translate.

44. On June 22, 2020, I navigated to the Osceola County SOE’s Twitter Profile, https://twitter.com/VoteOsceola/. Based on my review of the Osceola County SOE’s Twitter account, the Osceola SOE provides a substantial amount of timely information to voters via Twitter.

45. For example, at 1:09 P.M. on June 11, 2020, the Osceola SOE Twitter account posted a tweet which read, “DYK... the signature on EVERY vote by mail ballot envelope is compared to the voter's signature of record? This is why it is important for you to keep your signature up to date. #VoteByMail.”

46. That tweet is available at https://twitter.com/VoteOsceola/status/1271127547808550912, and a true and correct copy of the tweet is attached as Exhibit 17. This document was produced to Defendants under Bates Number DD-000000248.

47. The Osceola County SOE’s Twitter account appears to only contain tweets written in English. The Osceola Count SOE does not appear to operate a separate Twitter profile for Spanish-speaking voters.

F. Polk County

48. On June 22, 2020, I reviewed the Polk County’s SOE’s website, https://www.polkelections.com/. The website is in English and provides partial
translation to Spanish through Google Translate. The SOE does not provide a full, human-generated Spanish equivalent website.

49. The website contains seven main subpages, which each, in turn, contain myriad sub-subpages. For example, the “Voter Services” subpage, [https://www.polkelections.com/Voter-Services](https://www.polkelections.com/Voter-Services), contains 18 different sub-subpages, including “Vote-by-Mail FAQ,” “Contact Us,” “Early Voting,” “Precinct Lookup,” “Where Do I Vote” and “Provisional Status.” Each of these is only available in Spanish by using Google Translate.

50. Meanwhile, the Polk County SOE provides only a single page of Spanish-language content, titled “Español,” with only eleven links to Spanish-language resources. A true and correct PDF of that page, [https://www.polkelections.com/Espanol](https://www.polkelections.com/Espanol), is attached as Exhibit 18. This document was produced to Defendants under Bates Number DD-000000272.

51. The Polk County SOE website site map, [https://www.polkelections.com/About/Polk-Site-Map](https://www.polkelections.com/About/Polk-Site-Map), lists all these pages and subpages, visually indicating little information is provided in Spanish as compared to English. A true and correct copy of the Polk Count SOE website site map is attached as Exhibit 19.

52. When I previously viewed the Spanish webpage on or around June 15, 2020, the “Votar por correo”—vote by mail—option listed on this page linked to a
broken page that read “404 - File or directory not found,” at https://www.polkelections.com/Portals/Polk/Documents/pdfs/2020-2022%20SPANISH%20-%20VOTE%20BY%20MAIL%20UPDATED%20WITH%20NEW%20LAW.pdf.

53. A true and correct copy of this page as it appeared on June 15 is attached as Exhibit 20. This document was produced to Defendants under Bates Number DD-0000000261.

54. On June 22, 2020, I again navigated to the Español page and clicked the link next to “Votar por correo.”. This time, the link took me to a Spanish-language PDF, titled “Informacion para el votante.” A true and correct copy of this PDF is attached as Exhibit 21.

55. The link for this PDF is https://www.polkelections.com/Portals/Polk/FINAL_Spanish_Voter_Info_Brochure.pdf?ver=2020-06-18-175151-477. The character string “ver=2020-06-18” in the URL appears to indicate the document was added to the site on June 18, 2020, after my initial visit to the site.

56. A screenshot of the webpage, edited with arrows to indicate the hyperlink and destination URL, is attached as Exhibit 22.

57. In addition, the new PDF contains very little information about the vote-by-mail process, and appears nearly identical to another PDF, also titled
“Información para el votante” and linked on the Español page next to the text “Información Para El Votante.”

58. On June 22, 2020, I navigated to the Polk County SOE’s Twitter Profile, https://twitter.com/polkelections1. Based on my review of the Polk County SOE’s Twitter account, the Polk SOE provides a substantial amount of information to voters via Twitter.

59. For example, on that profile, I found a tweet dated 2:16 PM on June 11, 2020, which read, “It's common for signatures to change over the years, please make sure your latest signature is on file. Call the Elections Office at (863) 534-5888 for information on how to update your signature.”

60. That tweet is available at https://twitter.com/PolkElections1/status/1271144409111937024 and a true and correct copy of the tweet is attached as Exhibit 23. This document was produced to Defendants under Bates Number DD-000000267.

61. The Polk County SOE’s Twitter account appears to only contain tweets written in English. The Polk Count SOE does not appear to operate a separate Spanish-language Twitter profile.
I hereby declare under penalty of perjury that the foregoing is true and correct.


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Pamela Cataldo