

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

CASE NO. 08-21243-CIV-ALTONAGA/Brown

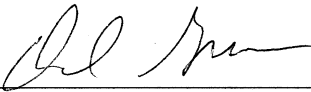
League of Women Voters of Florida, <i>et al.</i> ,	:
	:
Plaintiffs,	:
	:
vs.	:
	:
Kurt S. Browning, in his official capacity,	:
and Donald L. Palmer, in his official capacity,	:
	:
Defendants.	:

SUPPLEMENTAL EXPERT DECLARATION OF DON GREEN

1. I submit this declaration to supplement the declaration I submitted on May 14, 2008.
2. Community-based registration drives are more than clerical exercises whereby voters are assisted in filling out forms. I have studied a variety of nonpartisan groups that have conducted registration drives, among them ACORN, PIRG, and the New Voters Project, and in each case canvassers sought to pique voters' interest in the upcoming election by discussing the issues that were at stake. Although the specific issues varied from one campaign to the next, canvassers invariably talked about the fact that an election was imminent and tried to convince the voter that his or her participation in the electoral process was valued.
3. Registration drives in practice are therefore typically attached to political speech. Even when canvassers are not advocating on behalf of a candidate or cause, they always stress the importance of electoral participation. Although this type of political message is uncontroversial today, we should not lose sight of the fact that electoral participation was an issue that distinguished our political system from other polities at the time of its founding.
4. I would add that as a practical matter, community based registration drives often target specific racial, ethnic, linguistic, or socioeconomic groups. The fact that registration drives often bring out voters from communities that may sway elections is why voter registration has historically been a politically contentious activity. Even if canvassers were to say nothing whatsoever about issues or the upcoming election, the

symbolic meaning of their activity has an unmistakable political meaning: the voter's participation in the upcoming election is important. This meaning would be altogether different if the form in question were a health survey or petition to bring back reruns of a defunct TV series. Registration drives are without question acts of political expression.

5. Finally, community-based registration drives frequently target groups with low registration rates precisely because unregistered adults in these groups are often unlikely to register otherwise. Although in principle every American has equal access to registration forms and information about how to register, in practice levels of information, interest in politics, and feelings of connection to the electoral process decline markedly as one moves from middle-class communities to low-income communities. Community-based registration drives and the encouragement that canvassers provide when distributing registration materials are designed to close the socioeconomic gap in electoral participation.

Signed  Executed on June 6, 2008