

UNITED STATES DISTRICT COURT
DISTRICT OF COLORADO

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COMMON CAUSE OF COLORADO, on behalf of itself	:	
and its members; MI FAMILIA VOTA EDUCATION	:	
FUND; and SERVICE EMPLOYEES INTERNATIONAL	:	
UNION, on behalf of itself and its members,	:	
Plaintiffs,	:	Civil No. 08-cv-02321-JLK
	:	
	:	
vs.	:	
	:	
BERNIE BUESCHER, in his official capacity as Secretary	:	
of State for the State of Colorado,	:	
	:	
Defendant.	:	
	:	
	:	
	:	

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SUPPLEMENTAL DECLARATION OF JENNIFER ROSE FLANAGAN

I, Jennifer Rose Flanagan, declare are follows:

1. I am currently Director of Common Cause of Colorado, herein after Common Cause.
2. Common Cause's missions statement states that its purpose is "[t]o strengthen public participation and faith in our institutions of self-government; ... to promote fair elections and high ethical standards for government officials; and to protect the civil rights and civil liberties of all Americans."

3. As part of its goal to promote open, honest and accountable government, Common Cause is committed to ensuring that every eligible American, and every eligible Common Cause member, has the right to vote and the opportunity to exercise that right.

4. If the 20-Day Rule remains in effect through Election Day – November 2, 2010 - the ongoing, improper purge of eligible voters from Colorado’s election rolls under the 20-Day Rule will directly impacts Common Cause, its ability to fulfill its mission, and its expenditure of time, energy, and resources.

5. As part of fulfilling its mission, Common Cause is operating the Just Vote Colorado program for the 2010 general election cycle.

6. This includes setting-up a Voter Protection Hotline that is currently available to the general public and will be available to the general public on Election Day under the direction of Common Cause. This hotline provides assistance to individuals with questions or concerns about voting.

7. I am responsible for conducting the training of volunteers answering the Voter Protection Hotline. If the 20-Day Rule remains in effect, I will be required to address this issue during the training sessions.

8. The Just Vote Colorado program for the 2010 general election cycle also includes poll monitoring.

9. I am responsible for conducting the training of these poll monitoring volunteers. If the 20-Day Rule remains in effect, I will be required to address this issue during the training sessions.

10. Because the time and resources available to Just Vote Colorado and Common Cause is limited, if Common Cause is required to divert further resources toward training

volunteers about the 20-Day Rule, it will necessarily be diverted away from other work that the could be preformed to make Just Vote Colorado and the Voter Protection Hotline more effective and useful to voters.

11. Our coordinating steering committee for Just Vote Colorado includes The Colorado Lawyers Committee, the Legal Center for People with Disabilities and Older People, the Latina Initiative and the Colorado League of Women Voters. Organizations who utilize the Just Vote Colorado program include (but are not limited to) The Colorado Progressive Coalition, ACLU of Colorado, New Era Colorado, and Colorado's Civic Engagement Roundtable.

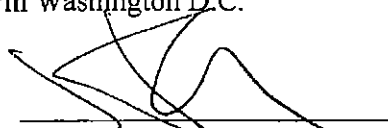
12. Several of these organizations have conducted voter registration during the 2010 election cycle, including, but not limited to, the Latina Initiative. If the 20-Day Rule remains in effect, I will be required to conduct further training with the members of our steering committee about this issue so that all members are properly informed about the potential negative effect of the Rule on their registration efforts, and properly informed about the need for public education and advocacy to ensure that Colorado voters are aware of the need to double check the status of their registration 20 days after they register to vote.

13. In my capacity as Director of Common Cause of Colorado, I sit on Colorado's Civic Engagement Roundtable. Many of the members of this Roundtable have conducted voter registration during the 2010 election cycle. If the 20-Day Rule remains in effect, I will be required to conduct further training with the members of the Roundtable about this issue so that all members are properly informed about the potential negative effect of the Rule on their registration efforts, and properly informed about the need for public education and advocacy to ensure that Colorado voters are aware of the need to double check the status of their registration 20 days after they register to vote.

14. The agendas of these groups, the Just Vote Colorado Steering Committee and the c3 Roundtable, are very packed, with limited resources. If we are required to spend some of the limited time and resources available to address the 20-Day Rule, there will necessarily be a diversion of resources away from other voter protection and education activities.

I affirm under the penalties of perjury under the laws for the United States that the foregoing representations are true.

Executed this 6th day of October in Washington D.C.


Jennifer Flanagan

CERTIFICATE OF SERVICE

I hereby certify that on October 6, 2010, I electronically filed the foregoing Supplemental Declaration of Jennifer Flanagan with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the registered, interested parties via electronic mail.

Executed on October 6, 2010

/s/ James M. Finberg