UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF FLORIDA

LEAGUE OF WOMEN VOTERS OF FLORIDA,

Plaintiff.

٧.

RICHARD SCOTT, in his official capacity as Governor of the State of Florida, and KEN DETZNER, in his official capacity as Secretary of the State of Florida

Defendants.

CASE NO .:

DECLARATION OF LILLY PAEZ

- I, Lilly Paez, do hereby state as follows:
- 1. I am 28 years old and live in Coral Gables, Florida. I was born in Costa Rica and came to the United States when I was 14. I came here with my parents on a visa; my father was a diplomat for the Costa Rican government. I have been a Legal Permanent Resident since March 2011.
- 2. Except for a short period in which I lived in New York, I have resided in Florida for my entire time in the United States. I attended high school and college in Florida, and am a graduate of Florida International University. Since 2013, I have lived in Coral Gables. My current address is 232 Majorca Avenue,

Apartment 5, Coral Gables, Florida 33134. I have lived at this address for close to two years.

- 3. I currently work as a program sales coordinator for Discovery

 Communications here in Florida.
- 4. Ever since I came here at the age of 14, I have dreamt of becoming a United States citizen. I love this country and I love the democratic process, and I wanted to become a citizen as soon as I could.
- 5. In April of this year, I began the process of becoming a naturalized citizen specifically because I wanted to vote in this year's election. I believe that every election is important, including those for state or local offices. But, as a Latina, I also believe that this election is especially important for my community.
- 6. Since April, I have completed nearly all of the steps needed to obtain my citizenship. I had my interview very recently, on October 3.
- 7. As of Saturday, October 8, the only step remaining for me to become a citizen was to be sworn in at a naturalization ceremony scheduled for 10am that day. That ceremony was to be held at the Hialeah office of United States Citizenship and Immigration Services (USCIS).
- 8. Because I saw how Hurricane Matthew was affecting office closures in Florida, I checked with USCIS to see if my ceremony was still happening.

 When I visited the agency's website, it said that the Hialeah office was closed on

October 6 and 7 but did not mention anything about my October 8 ceremony.

When I called the agency's hotline, I also received no information stating that the ceremony was cancelled.

- 9. I therefore went to the Hialeah USCIS office for the ceremony on the morning of October 8. When I arrived, the security guard there told me that the office was closed because of Hurricane Matthew and that I should receive a call from USCIS regarding a new date for the ceremony. There was a sign on the door that stated that the office was closed on October 6, but nothing stating that the October 8 ceremony was cancelled. I took a picture of that sign.
- 10. I intended to register to vote immediately after my October 8 naturalization, because I knew that Florida's voter registration deadline was October 11. If someone were present to register me at the ceremony, I would have done so there. Otherwise, I would have located someone to assist among the many groups that have been conducting voter registration drives in my area.
- 11. On October 10, I received a phone call from USCIS informing me that my ceremony will take place on October 15, four days after Florida's deadline and three days after the extended deadline set by the court.
- 12. Preparations for Hurricane Matthew postponed my naturalization ceremony and disrupted standard operations of all kinds across the state. But for my ceremony being cancelled because of the hurricane, I would have become a

vote.

- 13. If Florida's voter registration deadline remains where it is, I will be able to neither register nor vote.
- 14. But if it were moved to a date on or after my scheduled October 15 naturalization ceremony, I would register and vote in this November's election. I have waited the necessary years and followed all of the proper procedures so that I could become a citizen and have my voice heard in this country that I love. The right to vote defines American citizenship. If I can exercise that right this year once I am naturalized, I will proudly do so.

In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Lilly Paez

Executed on this 11th day of October 2016.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished to the following parties via electronic mail;

- David Fugett, Counsel for The Secretary of State, david.fugett@dos.myflorida.com,
- William Spicola, General Counsel for Governor, Rick Scott, william.spicola@eog.myflorida.com

/s/ Farrah R. Berse____

Farrah R. Berse