

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF FLORIDA

LEAGUE OF WOMEN VOTERS OF  
FLORIDA,

Plaintiff,

v.

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.:

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**DECLARATION OF PAMELA GOODMAN**

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I, Pamela Goodman, hereby declare as follows:

1. I am a registered voter and Florida resident. I have served as President for the League of Women Voters of Florida (“LWVF”) since May 2015. I submit this declaration in support of Plaintiffs’ motion for a preliminary injunction to extend Florida’s voter registration deadline because of the evacuations, closures, and damage caused by Hurricane Matthew.

2. Prior to my current role as President of LWVF, I served as President of the League of Women Voters of Palm Beach County from 2005 to 2009. I have served on the LWVF State Board of Directors since 2007, and I previously served on the national League of Women Voters Nominating Committee and the National

Membership Recruitment Committee. While serving as President of the Palm Beach County League, I was appointed by the Supervisor of Elections in Palm Beach County to head a review and audit of voting machines and processes for the 2006 and 2008 elections. I also spearheaded Project ROAR (short for “Reach Out And Register”), LWVF’s successful statewide push to maximize voter registration efforts before the 2008 general election.

3. I have received numerous awards for my service, including the Susan B. Anthony Award for Outstanding Feminist 2008 from the National Organization for Women.

4. I have extensive experience personally assisting new voters in registering and working with LWVF volunteers to register voters. The culture of LWVF volunteerism is one of public service and civic education. We get together to help other citizens register to vote, particularly those who would have a hard time navigating the voter registration processes and overcoming barriers to voting and registering without our assistance. This may be because of a disability, being intimidated by complex forms that are difficult for many to read and complete, or obstacles such as lack of transportation, time, or information needed to complete voter registration. We also work hard to register those who have never registered to vote, including students and newly-naturalized citizens.

### **The League of Women Voters' History, Mission, and Structure**

5. The national League of Women Voters was founded by Carrie Chapman Catt in 1920 during the convention of the National American Woman Suffrage Association. The convention was held just six months before the nineteenth amendment to the U.S. Constitution was ratified, giving women the right to vote after a 57-year struggle.

6. The League of Women Voters of Florida was founded in Florida in 1939. LWVF is a non-partisan, not-for-profit corporation organized under the laws of Florida. It has more than 4,000 current dues-paying members in Florida, and a list of more than 20,000 members, supporters, and volunteers, who receive regular communications from LWVF.

7. LWVF has 31 separately incorporated city- and county-based local leagues throughout Florida ("chapters" or "local leagues").

8. LWVF's mission is to promote political accountability by encouraging the informed and active participation of citizens in government. LWVF also influences public policy through education and advocacy. One of LWVF's primary goals is to promote effective voter participation in government. LWVF accomplishes this goal by: (1) conducting voter registration drives throughout the state; (2) holding educational forums and candidate debates open to the public; (3) publishing a quarterly newsletter and hosting a website; (4)

distributing both a non-partisan bi-annual election guide to candidates for statewide office, and objective information regarding proposed constitutional amendments in Florida, (5) distributing information on topics including government reform, education, natural resources, social policy, and fiscal policy, and; (6) encouraging voters to register at election offices and at motor vehicle branches and other government service providers.

### **LWVF's Voter Registration Activity**

9. Registering new voters is a critical part of LWVF's mission to promote political responsibility through an informed and active citizenry. It is also an important part of accomplishing our goal of increasing political participation by women, youth, students, and citizens in traditionally underrepresented and disenfranchised communities, particularly naturalized citizens and residents of low income, African American, and Hispanic communities. Indeed, recognizing Florida's diverse population, LWVF publishes state-wide candidate guides in both English and Spanish.

10. Voter registration is particularly important and integral to LWVF's mission in presidential election years. The heightened attention to politics makes citizens more interested in government, which gives LWVF an opportunity to engage them in the political process and in the values and issues for which the League of Women Voters stands.

11. LWVF conducts annual voter registration drives through its 31 local leagues. There is always at least one state and one local board member in charge of voter service, who communicate to those members coordinating voter registration drives at the local level.

12. These drives occur throughout the year, but are especially active immediately prior to voter registration deadlines for the general election. The days immediately preceding the voter registration deadline are often the busiest, both in terms of the number of volunteers wanting to participate and the number of new registrations the drives generate. This year, with the extent of the attention on the 2016 election resulting from the first two presidential debates, the final days before the registration deadlines provide a particularly crucial opportunity to bring more citizens into the democratic system.

13. Typically, local leagues will register new voters by attending community events or talking to citizens at institutions and high-traffic areas, such as malls, schools, or nursing homes. At these events, our volunteers often set up tables and encourage passers-by to stop and fill out a new voter registration application. Alternatively, volunteers walk around high-traffic areas with applications on clipboards and ask individuals if they would be willing to register to vote.

14. Local leagues also make a point to go to places where people who may not have either the means or the opportunity to otherwise register to vote congregate. For instance, LWVF members and volunteers register many people who do not have a car to go to the motor vehicle offices or the offices of their local supervisor of elections. Some people who register with the assistance of LWVF are intimidated by the prospect of navigating a government office. Our targeted voter registration activity has included trips to nursing homes and outreach to social service providers.

15. Many of LWVF's outreach activities are directed at Spanish-speaking communities. The Orange County League originally spearheaded the "Vamos A Votar Coalition," a non-partisan campaign to increase Hispanic voter participation in Central Florida. This campaign continues statewide through a Spanish language website, [www.vamosavotar.org](http://www.vamosavotar.org), maintained by the LWVF Education Fund, which also maintains an English language version of the website, [www.bereadytovote.org](http://www.bereadytovote.org). Similarly, when the Pinellas County League recognized that there was a growing Hispanic population in that county, it started holding voter registration drives at a newly opened Hispanic community center and at Hispanic fairs to register voters.

16. At least three local leagues, including the Miami-Dade, Jacksonville/First Coast, and Palm Beach Leagues, regularly attend naturalization ceremonies in their communities. There, League members encourage and assist

new U.S. citizens in registering to vote as a new opportunity and responsibility of citizenship. League members also encourage these new citizens to become engaged in the political process locally and on a state and federal level by becoming LWVF members and by lobbying elected officials on issues of importance in their communities and for new citizens.

### **Hurricane Matthew's Impact on LWVF Voter Registration Activities**

17. Hurricane Matthew, a Category 4 hurricane at the time it was approaching Florida, placed over 1.5 million Floridians in evacuation zones along the entirety of the state's east coast. Schools and government offices were closed throughout much of the state on Thursday, October 6th and Friday, October 7th. More than 1.1 million Floridians were left without electricity at the height of the storm, and over 175,000 Floridians still lacked power on the morning of Monday, October 10th.

18. Due to Matthew's impact, approximately 15 of LWVF's 31 chapters were forced to cancel planned voter registration drives on or after Thursday, October 6th. These included leagues in four out of the five most populous counties in the state—Broward, Miami-Dade, Orange, and Palm Beach counties. Some leagues had to cancel drives on Saturday, October 8th, and as of the close of business on Monday, October 10th, at least four local leagues—Brevard, Flagler, Jacksonville/First Coast, and Volusia—still had not been able to resume voter

registration activities because of power and internet outages, mail interruptions, and flooding.

19. Losing registration opportunities right before the registration deadline is especially damaging given the volume of registration activity that typically takes place during this time period. For example, when the Orange County League resumed voter registration for a few hours on Saturday, October 8th, there were lines of people waiting to be registered, including traditionally underrepresented communities such as young single women and minority voters. A few hours were insufficient to regain the lost opportunities to reach more voters—opportunities that can be regained only if the deadline is extended.

20. Hurricane Matthew disrupted LWVF's best opportunities to register individuals who belong to the communities we who rely on us most. Those most likely to register closest to the deadline are traditionally underrepresented groups—residents of low income, African American, and Hispanic communities—that the League of Women Voters strives to engage in our nation's political processes. The Hurricane additionally prevented LWVF chapters from attending and registering new citizens at naturalization ceremonies. The League is aware of at least four naturalization ceremonies scheduled for October 7th and 8th that were postponed because of Hurricane Matthew. In two of these locations, the ceremonies have been rescheduled for dates later than October 12th but before October 18th. Each




naturalization ceremony could result in hundreds of new citizens being sworn in and potentially hundreds of new voters registered.

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

DATED this 11th day of October 2016.

  
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Pamela Goodman

**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](mailto:david.fugett@dos.myflorida.com),
- William Spicola, General Counsel for Governor, Rick Scott, [william.spicola@eog.myflorida.com](mailto:william.spicola@eog.myflorida.com)

/s/ Farrah R. Berse

**Farrah R. Berse**