

EXHIBIT C

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UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

13 MARIA M. GONZALEZ, JESUS M.
14 GONZALEZ, BERNIE ABEYTIA,
15 LUCIANO VALENCIA, DEBBIE LOPEZ,
16 SOUTHWEST VOTER REGISTRATION
17 EDUCATION PROJECT, VALLE DEL
18 SOL, FRIENDLY HOUSE, CHICANOS
19 POR LA CAUSA, INC. and ARIZONA
20 HISPANIC COMMUNITY FORUM,

21 **Plaintiffs,**

22 **VS.**

23 STATE OF ARIZONA, JAN BREWER,
24 in her official capacity as Secretary of
25 State of the state of Arizona;
26 LeNORA JOHNSON, Apache County

27 Recorder, CHRISTINE RHODES, Cochise
28 County, Recorder, CANDANCE OWENS,
Coconino County Recorder, LINDA
HAUGHT ORTEGA, Gila County
Recorder, WENDY JOHN, Graham
County Recorder, BERTA MANUZ,
Greenlee County Recorder, SHELLY
BAKER, La Paz County Recorder,
HELEN PURCELL, Maricopa
County Recorder, JOAN McCall, Mohave
County Recorder, LAURETTE JUSTMAN,
Navajo County Recorder, F. ANN
RODRIGUEZ, Pima County Recorder,
LAURA DEAN-LYTLE, Pinal County
Recorder, SUZIE SAINZ, Santa Cruz
County Recorder, ANN WAYMAN-
TRUJILLO, Yavapai County Recorder,
SUSAN HIGHTOWER MARLER, Yuma
County Recorder, in their official

Case No.

DECLARATION OF LYDIA.
CAMARILLO IN SUPPORT OF
PLAINTIFFS' EX PARTE
APPLICATION FOR A TEMPORARY
RESTRAINING ORDER AND ORDER
TO SHOW CAUSE RE:
PRELIMINARY
INJUNCTION

1 capacities as County Recorders of the State
of Arizona; PENNY L. PEW, Apache
2 County Election Director, THOMAS
SCHELLING, Cochise County Election
3 Director, PATTY HANSEN, Coconino
County Election Director, DIXIE
4 MUNDY, Gila County Election Director,
JUDY DICKERSON, Graham County
5 Election Director, YVONNE PEARSON,
Greenlee County Election Director,
6 DONNA J. HALE, La Paz County Election
Director, KAREN OSBORNE, Maricopa
7 County Election Director, ALLEN
TEMPERT, Mohave County Election
8 Director, KELLY DASTRUP, Navajo
County Election Director, BRAD R.
9 NELSON, Pima County Election Director,
GILBERTO HOYOS, Pinal County
10 Election Director, MELINDA MEEK,
Santa Cruz County Election Director,
11 LYNN A. CONSTABILE, Yavapai
County Election Director, PATTI
12 MADRILL, Yuma County
Election Director, in their official
13 capacities as County Election Directors
of the State of Arizona.

14 Defendants.

15
16 I, Lydia Camarillo, declare that the following is true and correct to the best of my
17 knowledge:

- 18 1. I am employed as the Vice President of the Southwest Voter Registration Education
19 Project (SVREP), a plaintiff in this case. I make this declaration in support of
20 Plaintiffs' Ex Parte Application for Temporary Restraining Order and Order to Show
21 Cause Re Preliminary Injunction.
- 22 2. I have served as Vice President of SVREP since August 2003. From December 1994
23 through September 1999 I served as Executive Director of SVREP, and from
24 September 1, 2005 to March, 2006 I was Acting President. During my employment
25 with SVREP, I have been responsible for supervising the voter registration,
26 education and voter turnout efforts of SVREP.

1 3. Plaintiff SOUTHWEST VOTER REGISTRATION EDUCATION PROJECT
2 (SVREP) is a non-profit and non-partisan organization committed to improving the
3 participation of Latino and other minority communities across the United States in
4 the democratic process, through voter registration, voter education and voter
5 participation activities. Since its founding in 1974, SVREP has conducted more than
6 2,200 voter registration campaigns in 15 states, including Arizona. SVREP conducts
7 its voter registration activities at community-based sites such as school campuses,
8 malls and fairs. Because Proposition 200 has limited the number of persons that
9 SVREP can register to vote and impaired the ability of SVREP to conduct voter
10 registration and turnout efforts, SVREP has been injured by Proposition 200.

11 4. SVREP is the nation's largest and oldest non-profit organization focused on
12 increasing Latino voter registration and participation and has registered 2.3 million
13 voters since its founding.

14 5. SVREP conducts its voter registration and voter mobilization campaigns in a similar
15 fashion across the United States, including Arizona.

16 6. We select a local community, meet with leaders and ask them to provide us with 2-
17 10 names of neighborhood leaders. From this group we organize a steering
18 committee which will determine the goals and objectives of the project. The
19 committee monitors the voter campaign, recruits volunteers, serves as the public
20 voice for the voter campaign, and helps supervise the locally-hired Field Organizers.
21 The Field Organizers in turn supervise the activities of 10-20 Project Coordinators.

22 7. SVREP trains the Field Organizers and Project Coordinators and helps them develop
23 their plan for a non-partisan voter campaign. SVREP also trains the Organizers and
24 Project Coordinators on how to conduct community based voter registration, using
25 clipboards to be more mobile and following the state rules regarding voter
26 registration.

1 8. SVREP campaigns have relied on voter registration forms promulgated by the
2 Secretary of State of the state in which the campaign is occurring as well as the
3 federal mail voter registration application.

4 9. In a non-Presidential cycle, SVREP normally spends the equivalent of \$20 per voter
5 to conduct a registration and mobilization campaign. Thus, in order to register and
6 turn out 1,000 voters SVREP can expect to use \$20,000 from its budget. This
7 amount assumes that voter registration is conducted by volunteers under the
8 supervision of project Field Organizers.

9 10. As a non-profit organization, SVREP raises money from private donors. As a result,
10 SVREP's resources are very limited. If SVREP is required to expend greater
11 resources on one voter campaign, it impairs our ability to conduct additional voter
12 campaigns and fulfill our mission of improving the participation of Latino and other
13 minority communities across the United States in the democratic process.

14 11. Proposition 200's proof of citizenship requirements for voter registration will
15 severely impair the ability of SVREP to register voters.

16 12. Because it is more cost effective, SVREP conducts voter registration at malls, sports
17 games, college campuses and other places where people congregate. It is less cost-
18 effective for SVREP to conduct voter registration in a door to door campaign.
19 Proposition 200's proof of citizenship requirements will greatly hinder SVREP's
20 voter registration efforts by requiring all canvassers to bring along photocopy
21 machines or scanners and printers to places where voters gather, or to bring such a
22 machine door to door in a neighborhood. SVREP simply does not have the resources
23 to equip canvassers with portable photocopy machines or scanners and printers in
24 order to conduct voter registration campaigns in Arizona.

25 13. In addition, in a time of heightened fear of identity theft, SVREP believes that even
26 if it were able to equip canvassers with photocopy equipment, few voter registration
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1 applicants would be willing to allow a canvasser to copy their citizenship documents,
2 such as birth certificates or passports.

3 14. Because of Proposition 200's proof of citizenship requirements, the only realistic
4 alternative for SVREP is to continue its voter registration activities by using the
5 federal mail voter registration application. Secretary of State Brewer's refusal to use
6 and accept the federal mail voter registration application, and her order that Arizona
7 county recorders do the same, forecloses the only avenue available to SVREP to
8 register voters for federal elections.

1 I declare under penalty of perjury under the laws of the United States that the
2 foregoing is true and correct and that this declaration was executed in the City of Phoenix,
3 AZ on May 9, 2006.

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6 Lydia Camarillo

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