

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

MI FAMILIA VOTA, TEXAS STATE
CONFERENCE OF THE NATIONAL
ASSOCIATION FOR THE ADVANCEMENT
OF COLORED PEOPLE, MICAELA
RODRIGUEZ and GUADALUPE TORRES,

NO. 5:20-cv-00830

Plaintiffs

v.

GREG ABBOTT, Governor of Texas; RUTH
HUGHS, Texas Secretary of State,

Defendants.

**DECLARATION OF ANGELICA RAZO, TEXAS STATE DIRECTOR OF
PLAINTIFF MI FAMILIA VOTA**

I, Angelica Razo, hereby state on my own knowledge and belief that:

1. I am of legal age and competent to provide this declaration. All the information herein is based on my own personal knowledge unless otherwise indicated.
2. I am the Texas State Director of Mi Familia Vota, a plaintiff in the above-captioned matter. I am authorized to provide this declaration on behalf of Mi Familia Vota.
3. Before I became Texas State Director, I worked for Mi Familia Vota in Texas as a youth organizer.
4. Mi Familia Vota is a civic engagement organization. Our election-related work usually involves facilitating voter registration and voter education.
5. We have had to divert substantial resources, personnel, and time to respond to the Governor and Secretary of State's decisions about elections during the pandemic.
6. We are fielding many more calls from voters in the communities that we serve, who are extremely concerned about how to vote during the pandemic.
7. The communities that we support do not feel comfortable or able to go to the state and county boards of election, and so they have turned to us for guidance on voting during the pandemic.

8. We lobbied Secretary of State Hughs by letter in March 2020, urging her to take immediate action to make voting safer, including by making in-person voting safer. We asked Secretary of State Hughs to issue sufficient uniform guidance to help counties find safe polling places, boost curbside voting, ensure that all polling locations have appropriate protective supplies, and assist counties with recruiting and training poll workers to administer polling sites safely. We knew that uniform, sufficient safety policies were necessary to adequately and equally protect Texan voters.
9. Secretary of State Hughs never responded to our letter, and Hughs and Governor Abbott have still not issued sufficient uniform election safety policies.
10. Because of the lack of uniform policies from the Secretary of State and Governor, we have had to divert resources, personnel, and time toward working with county election officials county by county in order to learn what their varying pandemic election policies are in order to accurately inform voters. These policies continue to change, causing us to continue to divert resources to this project and away from our typical voter education work.
11. We have spent resources to work with counties to do walk-throughs of polling places while taking videos and pictures that we can share with concerned Texans who want to know what voting will be like on election day. This is not an activity we undertook previously, and would not be necessary if Secretary of State Hughs and Governor Abbott issued uniform guidance for polling-place safety.
12. Because the Secretary of State and Governor have not required or assisted county officials to inform voters sufficiently or early enough about polling-site changes, which have been far more numerous and frequent during the pandemic, we have had to frequently investigate county-by-county polling location changes so that we can inform our community members.
13. Because the State has not issued uniform requirements or guidance, we have had to lobby counties about expanding in-person voting options, including through more curbside voting or more drop-off ballot locations, and how to get these initiatives off the ground before the election. This has diverted significant time toward communicating with county election officials from our normal work communicating with voters.
14. These are resources we would not have to expend if the Governor and Secretary of State created and supported implementation of sufficient uniform safety protocols that apply across the state.
15. We also have allocated additional resources and personnel toward recruiting poll workers. While this has always been a small part of our program, we have had to place substantially more time on poll worker recruitment this year. We have had to work closely with county offices discussing how young poll workers are going to be trained,

prepared, and protected to keep them and voters safe.

16. It is urgent that new poll workers are found to serve as many polling places as possible during the pandemic (so voters have more options and need not congregate at fewer locations), but we are concerned that young poll workers of color will be treated as expendable.
17. If Governor Abbott and Secretary of State Hughs created uniform procedures and identified resources for recruiting, training, and protecting poll workers, then we would not have to reallocate our resources (or as many resources) toward this work.
18. If Mi Familia Vota had not diverted its resources to address these gaps left by the Governor and Secretary of State, the voters it serves would have faced greater confusion and health risks, and Mi Familia Vota's mission of fostering voter education and participation would have suffered.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on August 26, 2020.

A handwritten signature in black ink, appearing to read 'Angelica Razo', written over a horizontal line.

Angelica Razo
Texas State Director
Mi Familia Vota