

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MI FAMILIA VOTA EDUCATION FUND;
SARA SCHWARTZ; and MARLA LOPEZ,

Plaintiffs,

-against-

DONALD J. TRUMP, in his individual and
official capacity as President of the United States;
WILLIAM P. BARR, in his official capacity as
Attorney General; and CHAD F. WOLF, in his
official capacity as Acting Secretary of Homeland
Security,

Defendants.

No. 20 Civ. 03030

**SUPPLEMENTAL
DECLARATION OF
HECTOR SANCHEZ BARBA**

HECTOR SANCHEZ BARBA declares under penalties of perjury, pursuant to 28 U.S.C. § 1746, as follows:

1. I am the Executive Director of Mi Familia Vota Education Fund (“MFV”), a Plaintiff in the above-captioned matter.
2. MFV continues to have a core mission of uniting Latino, immigrant, and allied communities to promote social and economic justice through citizenship workshops, voter registration, and voter participation, as identified in my first Declaration.
3. Voter education is a significant component of MFV’s core mission. For MFV, voter education focuses on programming designed to explain the election process and help voters understand the positions and issues on which the candidates are running.
4. MFV is also dedicated to ensuring that all eligible voters vote.
5. Defendants’ intimidation tactics and efforts to dissuade people from

voting by repeating the false assertion that mail ballots will not be counted directly conflicts with MFV's goal of promoting and encouraging voter participation.

6. Because of the misinformation spread by Defendants, we have had to steer our resources away from our get out the vote and voter education efforts. Instead, we have been required to focus on communicating to voters that our current system is reliable, that their mail-in ballots will arrive, and that their votes will be counted.

7. Our field teams now have to spend their contact time with voters assuring those voters that their vote is safe.

8. Our hotline staff, our phone bankers, and our texters have been forced to spend time answering voters' questions about Trump's repeated threats concerning investigations of voter fraud, calls to confront voters at polls, and his other intimidation tactics. These questions use up the time that would otherwise be spent educating voters on the candidates and the electoral process. They also limit the number of people our staff are able to connect with.

9. The misinformation threat is so serious that we have had to devote one full-time staff member to coordinate over fifteen students to monitor and counter the misinformation that is covered in multiple media channels. This staff member is a permanent employee that would otherwise have devoted her time on get-out-the-vote efforts, leadership development, and advocacy activities.

10. Almost every MFV staff member has been required to deviate from their normal duties to respond to concerns that voters continually raised based on the statements of Trump and his administration.

11. For example, our communications department staff have had to reallocate their time to developing educational content to fight the intimidating effect of Defendants'

misinformation. They have been required to conduct new research on the effect of Defendants' intimidation and to meet with state directors to identify the concerns that voters are conveying.

12. MFV's leadership, including its State Directors and me personally, has had to spend time responding to questions from both voters and media outlets about Defendants' intimidation tactics. The time we have devoted to responding to these questions could have been spent organizing our field staff and managing our get out the vote and voter education efforts.

13. The staff time and resources that MFV has devoted to combatting Defendants' intimidation and misinformation amounts to approximately 10% of MFV's approximately \$6 million annual budget.

Dated: October 28, 2020
Washington, DC

A handwritten signature in black ink, appearing to read "H. Sanchez Barba", with a large, sweeping flourish extending from the end of the signature.

HECTOR SANCHEZ BARBA