

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,

Plaintiffs

v.

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

Defendants.

NO. 5:20-cv-00830

DECLARATION OF PLAINTIFF GUADALUPE TORRES

I, Guadalupe Torres hereby state on my own knowledge and belief that:

1. I am of legal age and competent to provide this declaration.
2. I am a plaintiff in the above-entitled action.
3. I am a registered voter in Denton County, Texas.
4. I am Latina.
5. I live in Lewisville, and the part of Lewisville where I live is predominantly Latino.
6. I have always voted in person.
7. I do not qualify to vote by mail in Texas.
8. I live with my mother and my father, who both have health problems.
9. My mother, father, and I got COVID-19 in the early summer, though we were very careful, wore masks, and social distanced.
10. I was asymptomatic for over a week after I tested positive for COVID-19. After a week or so, I began to experience symptoms.

11. My mother and father both lost a lot of weight and became weak because of COVID-19. My mother still has trouble breathing, and my father's chronic cough has gotten worse. I am worried they both sustained lung damage.
12. Even though I contracted COVID-19, I know that not all people who get the virus are immune. I am worried about being exposed and getting sick from the virus again.
13. Because their health is fragile, I am very worried about what happens if we get the disease again.
14. Getting sick was financially difficult for my family.
15. During the time we were sick, my father, my mother, and I all were out of work for three weeks. My dad didn't get paid, which meant we couldn't afford our rent. Luckily, our landlord was understanding, but if he gets sick again, we would again fall behind on our rent.
16. Because I didn't get paid, I couldn't afford tuition and my college almost put a hold on my account. I would not have been able to register for classes or get my transcript. Although the financial aid office eventually helped with some additional aid, I am now on a payment plan, had to get help from my parents, and am working extra shifts to try to make up the difference. If I get sick again, I might not be able to catch up.
17. I have seen many cases of COVID-19 this summer. At this point, it is affecting everyone I know. Almost all of my friends have had a death in their family because of COVID-19.
18. I have seen many people refuse to wear masks in public. It is my understanding that masks are not required at polling places, and I am very concerned that many people will choose not to wear masks, and this will put me and other voters at risk.
19. I am worried about having to stand in long lines at my polling place. Even if they try to put up markers for social distancing, as lines of people get longer, it becomes harder or impossible to socially distance because they run out of room, and people start crowding.
20. Because I was asymptomatic for part of my illness, I know other people could be going to vote without knowing they are sick, and maybe without wearing masks or being careful about what they touch.
21. I don't feel safe voting in person during the pandemic. I am concerned that I will get sick again, or get my parents sick. But I don't want to give up my right to vote, either.
22. I wanted to vote early, but there have been record numbers of people voting. I am glad so many people are voting, but it means that early voting polling places near me have been busy with long lines.

23. I have not voted yet because I am worried about standing in line with people who aren't wearing masks.

24. If I knew everyone was going to be wearing a mask, I would definitely go out to vote. I would still be worried about the lines, but I know masks make the chances of transmission drastically lower.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on October 19, 2020.

Guadalupe Torres