

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA**

)	
COMMON CAUSE GEORGIA, as an)	
organization,)	
)	
<i>Plaintiff,</i>)	
)	
)	
)	
v.)	Case No. 18-cv-05102-AT
)	
BRIAN KEMP, in his official capacity as)	
Secretary of State of Georgia)	
)	
)	
<i>Defendant.</i>)	
)	

DECLARATION OF HARRISON WOOD

I, **HARRISON WOOD**, declare as follows:

1. I make this declaration from my personal knowledge, and, if called upon to do so, I could and would competently testify to the matters set forth herein.
2. I am a United States citizen and a resident of Georgia. I moved to Georgia from Boston in mid-September with my partner, who works in the Affordable Housing Department in the Georgia Department of Community Affairs in Atlanta, Georgia.
3. I work as a volunteer for the Democratic Party’s Georgia voter protection hotline in Atlanta, Georgia. I have been volunteering in this capacity since October 22, 2018, working three to six days a week, in shifts of three to eight hours.

4. At the voter protection hotline, I take calls from voters who are experiencing problems with voting or have questions about the voting process. My goal is to answer their questions or to provide them with information that will enable eligible voters to vote successfully.

5. Because I have worked many hours as a volunteer, I am recognized at the call center for my experience. On one day I was asked to manage a room of call center volunteers.

6. During the course of my work as a call center volunteer, I received a number of calls from voters who experienced problems with their voter registrations at the polls, including voters who had registered but whose names did not appear on the list, and voters who had previously registered and voted using their current address in 2016 but were told on Tuesday that their registrations were listed at an old address in a different county.

7. Many of the calls relating to voter registration problems came on the day before Election Day or on Election Day, both in terms of absolute numbers and as a proportion of overall calls.

8. When I take calls from individuals with voter registration problems, I try to determine based on publicly available information the cause of the problem.

9. One of the sources I consult is a list provided by the Secretary of State's office and published by Greg Palast, an investigative reporter, of individuals who were removed from the list of registered voters in 2017 and 2018 because they allegedly did not vote in two elections and did not respond to a postcard. Some of the individuals I spoke with who appeared on that list had, in fact, voted in 2016 without problem but now were not on the list.

10. In some cases, individuals called because their names were not on the voter list despite having registered, and I was unable to find their names on the registration list at any address or

on the published purge list. Some of those individuals claimed to have voted previously without problem.

11. A large proportion of the voter registration problem calls I received Tuesday were from individuals who had previously voted successfully from their current addresses but were told on Election Day that they were registered at a prior address. Many of those people told me they had taken specific actions to change their voter registration addresses, in person, online, or at the Department of Motor Vehicles or other state agencies. In some cases, callers said they had received written confirmation that their registrations were successfully updated.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 8th day of November, 2018 in Atlanta, Georgia.



Harrison Wood