

**DECLARATION OF JOHN W. YOUNG, III**

Pursuant to 28 U.S.C. § 1746, I, John W. Young, III, declare as follows:

1. I am the Senior Director of Voting & Democracy of Common Cause, over 18 years of age, and competent to make this declaration.
2. I have personal knowledge of the matters stated herein and would testify to the same if called as a witness in Court.
3. Common Cause is a not-for-profit corporation that carries out its mission in Georgia through Common Cause Georgia, whose offices are in Atlanta, Georgia, and who conducts activities and has members across the state.
4. Common Cause is one of the nation’s leading grassroots democracy-focused organizations and has over 1.2 million members nationwide and chapters in 25 states, including Georgia.
5. In Georgia, Common Cause works to “strengthen public participation in our democracy and ensure that public officials and public institutions are accountable and responsive to citizens.” Common Cause Georgia, <https://www.commoncause.org/georgia/>. Common Cause Georgia is engaged in voter education, voter ID assistance, election protection, census participation, redistricting advocacy, Get Out the Vote (“GOTV”) efforts, and impact litigation involving voting rights. We primarily engage with Georgia voters through our suite of online voter assistance tools, emails to our members, and our Election Protection volunteer recruitment and deployment program.
6. Common Cause has over 26,000 members in Georgia.
7. Common Cause has limited resources to cover all of this work with only three paid full-time staff members within the state.
8. In addition to our work in voting rights, we regularly offer civic education information on issues relating to our broad democracy agenda, including campaign finance and ethics reform.

9. Unlawful voter registration list maintenance activities so close to the election directly frustrate and impede Common Cause's core missions of making government more responsive to the interests of communities by diminishing the voices of the voters Common Cause works to engage and forces Common Cause to divert resources toward directly combatting the ill effects of such activities.
10. I am aware, through my counsel, that this lawsuit filed by Plaintiffs William T. Quinn and David Cross seeks to compel the Secretary of State to identify certain voters and remove them from "active" status on the official voter rolls to the "inactive" voter registration list before the November 2024 election.
11. I am very concerned that Plaintiffs' efforts to force the Secretary of State to conduct systematic list maintenance so close to the 2024 general election will adversely impact Common Cause's members and constituents by either dissuading them from voting altogether or causing them to face increased burdens in voting, either during the early voting period or on Election Day itself.
12. Based upon a review of internal, confidential membership information, Common Cause has individual members who reside in Georgia. At this time, Common Cause has members registered to vote in Georgia who intend to vote in the upcoming November 5, 2024, General Election and any ensuing runoff election. Common Cause also anticipates that it has members who are or will become registered voters in Georgia before November 5, 2024.
13. If successful, this suit could result in the unlawful inactivation of thousands of eligible, active, and registered voters, including Common Cause's members and constituents. Common Cause and its members have a strong interest in preventing such infringement with the rights of eligible voters in Georgia.
14. Common Cause has and continues to work to prevent efforts to suppress or disenfranchise Black and other underrepresented communities' voters and has been involved in voting rights litigation in Georgia to vindicate their rights.

15. Ahead of the November General Election, Common Cause has and continues to conduct voter outreach efforts throughout Georgia. Our voter empowerment programs include educating prospective voters about how to register to vote and to confirm their registration status.
16. Common Cause will have to divert our precious staff time away from other activities the organization had planned. For instance, in normal times, Common Cause typically performs a lot of work on matters outside of the voting process—for example, Common Cause has recently advocated for a U.S. Supreme Court code of ethics, opposed Cop City, combatted online dis/misinformation, advocated for transparent and accessible governmental systems, and advocated for money in politics solutions. Common Cause seeks to balance its limited time and resources between these areas.
17. Instead, depending on what the court decides to do here, we may have to deal with the aftermath of any potential unlawful inactivations before the General Election. This would include digital and perhaps phone-banking outreach to impacted voters to ensure that they have the information they need to cast a ballot. Direct services with individual members would otherwise comprise a small percentage of our core business activities. Our advocacy activities unrelated to voting rights like Supreme Court ethics and government transparency will suffer.
18. If successful, this suit could result in the unlawful inactivation of thousands of eligible, active, and registered voters, including Common Cause members.
19. Common Cause and its members have a strong interest in preventing such infringement with the rights of eligible voters in Georgia.
20. Given the substantial number of voters who may be potentially impacted by this lawsuit, a ruling ordering or allowing the Secretary of State to systematically move voters to the inactive list within 90 days of a federal election would directly harm Common Cause's organizational mission to ensure communities of color are not disenfranchised.

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

Executed this 2nd day of October 2024.

A handwritten signature in black ink, appearing to read "John W. Young, III". The signature is cursive and somewhat stylized.

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John W. Young, III  
Senior Director of Voting & Democracy  
Common Cause