

DECLARATION OF GERARDO E. GONZALEZ

Pursuant to 28 U.S.C. § 1746, I, Gerardo E. Gonzalez, declare as follows:

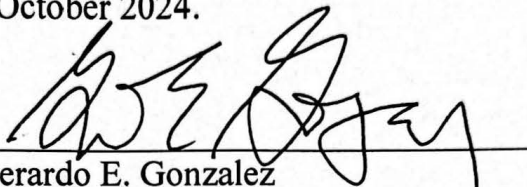
1. I am the Founder and current Chief Executive Officer of GALEO Latino Community Development Fund (“GALEO”). I have served in that role since 2020 and, before that, was Executive Director.
2. I am over 18 years of age and am competent to make this declaration.
3. I have personal knowledge of the matters stated herein and would testify to the same if called as a witness in Court.
4. GALEO was founded in 2004 and is a statewide nonprofit, nonpartisan organization with the mission to increase civic engagement and leadership development of the Latino/Hispanic community across Georgia. GALEO focuses on increasing civic participation of the Latino/Hispanic community and developing prominent Latino leaders throughout Georgia.
5. GALEO advocates on many issues of particular interest to the Latino/Hispanic community, including immigrant rights, voting rights, and participation in the census. GALEO also creates opportunities for members and individuals in the Latino/Hispanic community to build and develop leadership skills, and it encourages individuals to run for office or engage with their local PTAs, churches, etc.
6. GALEO has an active membership of approximately 200 individuals, many of whom are registered voters in Georgia.
7. GALEO has 16 full-time employees and has limited resources to cover all their work within the state.
8. In our experience, calls from outside individuals and groups for state and local election officials to conduct unlawful voter registration list maintenance activities close to a federal election can directly frustrate and impede GALEO’s core missions to increase civic engagement and leadership development of the Latino/Hispanic community across Georgia. Such calls tend to sow confusion and fear among GALEO’s

primarily Latino/Hispanic membership and constituency and consequently force GALEO to divert its limited resources toward directly combatting the negative effects of such activities.

9. 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.
10. 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 GALEO’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.
11. GALEO will also have to divert precious staff time away from other activities the organization had planned in the lead-up to the 2024 general election. Even now—in the final days before the October 7, 2024, deadline for registering to vote in Georgia—I and other members of GALEO’s staff have had to divert our time and attention from planning crucial voter registration activities and recruiting new, eligible voters, and instead pivot to combatting efforts by these Plaintiffs and others to lodge mass voter challenges with election officials across the state. This does real damage to our core organizational mission and priorities.
12. If successful, this suit could result in the unlawful inactivation of thousands of eligible, active, and registered voters, including GALEO’s members and constituents. GALEO and its members have a strong interest in preventing such infringement with the rights of eligible voters in Georgia.
13. 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 GALEO’s organizational mission to ensure Latino/Hispanic voters are not disenfranchised.

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

Executed this 1st day of October 2024.



Gerardo E. Gonzalez
Chief Executive Officer
GALEO Latino Community Development Fund, Inc.