

EXHIBIT B

SUPERIOR COURT FOR THE STATE OF ALASKA
THIRD JUDICIAL DISTRICT AT ANCHORAGE

ARCTIC VILLAGE COUNCIL,
LEAGUE OF WOMEN VOTERS OF
ALASKA, ELIZABETH L. JONES, and
BARBARA CLARK,

Plaintiffs,

v.

KEVIN MEYER, in his official capacity
as the Lieutenant Governor of the
State of Alaska; GAIL FENUMIAI, in
her official capacity as the Director of
the Alaska Division of Elections; and
ALASKA DIVISION OF ELECTIONS,

Defendants.

Case No. 3AN-20-07858C1

DECLARATION OF JUDY ANDREE

My name is Judy Andree. I am a resident of Alaska, over 18 years old, and competent to make this declaration. The facts in this declaration are based on my personal knowledge. If called upon as a witness, I would testify to these facts.:

1. I am the President of the League of Women Voters of Alaska ("LWVAK" or "we"), a role that I assumed in April 2017. As president of LWVAK, I am responsible for, among other things, overseeing the

activities, membership, and events of LWVAK, and directing its advocacy and voter outreach efforts.

2. LWVAK is a nonpartisan membership organization with a membership of roughly 350 people across Alaska. LWVAK works to encourage informed and active participation in government and influence public policy through education and advocacy.

3. To meet these objectives, LWVAK undertakes a number of activities related to voter registration including: organizing and running voter registration drives at high schools, colleges, libraries, assisted living centers, and various public events; designing and executing public information campaigns using press releases and social media about how to register and update one's voter registration; creating brochures about voter registration and topics such as absentee voting; and assisting voters who ask questions about voting through email, occasional telephone hotlines, and through our internet platforms.

4. LWVAK also conducts various voter mobilization and education activities including hosting candidate forums, developing voter guides, and conducting get-out-the-vote efforts. LWVAK also educates voters about new laws and plans to spend significant resources to educate

voters this year about the witness requirement for absentee voting in Alaska.

5. LWVAK conducts voter registration, voter mobilization, and voter education efforts regularly, and these efforts require significant volunteer hours and other resources, particularly during the current global health crisis caused by COVID-19. Because of the crisis and the accompanying social distancing recommendations, LWVAK has been devoting significant resources toward adapting many of its voter registration and voter outreach activities such that they can be performed remotely or without relying on in-person interactions. For example, we have been expanding the use of our two websites and social media outlets to educate voters on the process to vote by mail and other options that they have for a safer voting experience.

6. An issue that has grown in importance since the beginning of this crisis is the need for strong protections for absentee voters, who will likely make up a much larger share of the electorate than in past elections. LWVAK has been advocating for increased voting flexibility including the expanded use of absentee voting by mail in order to protect the safety and health of voters and poll workers during the COVID-19 pandemic. One aspect of the absentee balloting process that

LWVAK believes will pose a significant problem for voters in upcoming elections is the requirement that absentee voters have their mail-in ballot envelopes signed by a witness.

7. Based on conversations and communication among League members, we expect that this witness requirement will be a major barrier to voting for some League members and Alaska voters in general, and that many of them will be disenfranchised as a result of this requirement. More than half of LWVAK's members are senior citizens. Some of these older members also live alone and don't have anyone who could readily witness their ballot without violating social distancing protocols. As well, many of our Alaska voters are Native voters in small, remote communities, or disabled, or low-income registered voters who are staying home because they are at a higher risk of death or serious illness from COVID-19 due to age or preexisting medical conditions, like diabetes or hypertension.

8. I expect that there are many other voters such as these who are served by the LWVAK and its members and will face significant burdens complying with the witness requirement and that many will be disenfranchised should it remain. Voting by mail during a pandemic is

the safest way to vote, but requiring the search for a witness to a signature reduces that safety advantage.

9. Because the witness requirement remains in effect, the LWVAK is poised to divert resources from its voter registration, voter education, and voter mobilization activities towards advocating against and educating voters about the witness requirement, to prevent the requirement from disenfranchising its members and the voters they serve. If absentee voters were not required to have their mail-in ballot envelopes signed by a witness, LWVAK could spend less of its volunteer resources and time on educating voters about the witness requirement, and more on its other critical activities, including registering voters without being able to conduct in-person registration drives and educational events.

I certify under penalty of perjury that the foregoing is true, and that a notary public or other official empowered to administer oaths is unavailable.

Executed on September 8, 2020

s/ Judy Andree
Judy Andree

**Original signature and Form TF-835 forthcoming*