

EXHIBIT C

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

COMMON CAUSE, <i>et al.</i> ,)	
)	
Plaintiff,)	
)	
v.)	Case No. 17-1398 (RCL)
)	
PRESIDENTIAL ADVISORY)	
COMMISSION ON ELECTION INTEGRITY,)	
<i>et al.</i> ,)	
)	
Defendants.)	
_____)	

DECLARATION OF ANTHONY GUTIERREZ

I, ANTHONY GUTIERREZ, hereby state, under penalty of perjury, that the following information is true to my knowledge, information, and belief:

1. I reside in Austin, Texas and am a member of Common Cause. I also serve as the Executive Director of Common Cause Texas.

2. As a registered voter and someone who participates in the political process, I express my views through, among other things, casting my vote in elections.

3. I am aware of the Presidential Advisory Commission on Election Integrity's request for voter data, including its request for my party affiliation and voter history data. I am also aware of the investigation it is conducting of eligible, American voters.

4. I am aware that the Texas Secretary of State has stated that it plans to turn over voter registration data, including Social Security information and party affiliation.

Although presently the Texas Secretary of State has been enjoined by a state court from

turning over the data, I understand this injunction is only temporary and could be lifted at any time.

5. The Commission's collection and maintenance of voter information, including my party affiliation and voter history, is highly concerning to me.

6. I have never provided consent for the federal government to obtain my personal data, including data concerning my voting history and party affiliation.

7. I have and continue to experience a high level of anxiety over how the federal government is going to use my personal data, including my party affiliation and voting history data. I also am gravely concerned that the data will be released to others and/or the public.


8. Permitting the Commission to collect and maintain my personal voter history and party affiliation data undermines my confidence in our electoral and political process.

9. In addition, I fear that collection of voter data, including voting history and party affiliation, will lead to suppression of my vote and the votes of many others in my state. This fear is not unfounded. Commission members have made statements stating that voter data that is collected from the states is being and/or imminently will be cross-checked against data from other federal agencies. This cross-checking exercise could yield misidentification, leading my name to be removed from the voter rolls. This is particularly a risk for me and other voters with minority surnames, especially Latino surnames, that are often overrepresented in cross check-lists.

10. Moreover, the Commission has not been forthcoming regarding the way in which it is storing the data it seeks and is collecting. My personal data (including my address, and other potentially identifying information) will therefore be at risk.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed November 28, 2017.



Anthony Gutierrez