

Exhibit A

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

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UNITED TO PROTECT DEMOCRACY et al.)	
)	
	Plaintiffs,)	
	v.)	Civil No. 17-02016 (RC)
)	
PRESIDENTIAL ADVISORY COMMISSION)	
ON ELECTION INTEGRITY et al.)	
)	
	Defendants.)	
<hr/>)	

DECLARATION OF AMBER MCREYNOLDS

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DECLARATION OF AMBER MCREYNOLDS

I, Amber McReynolds, declare as follows:

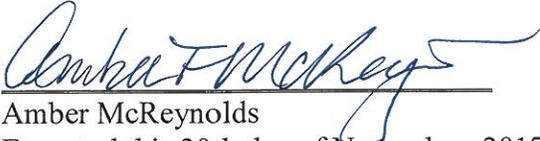
1. I am currently the Director of Elections for the Denver Elections Division of the Office of the Clerk & Recorder for the City and County of Denver, Colorado.
2. As part of my responsibilities as Director of Elections, I oversee the Elections Division, which provides comprehensive election services for the City and County of Denver, including voter record maintenance, election operations, election administration, and communications. Part of my responsibility it is to oversee the management of the voter registration database, administer voter registration outreach efforts, and monitor changes in voter registration status in the City and County of Denver. I also work to ensure that elections for local, state, and federal office are administered fairly and accurately and that they are secure, transparent, efficient, and reliable. Additionally, my team assists the citizens of Denver with the voter registration process, and we continually focus on improving voters' experience at the vote centers. My office has been recognized as a leader in election administration, and officials nationwide routinely consult with us for best practices.
3. I have served as Director of Elections in Denver since 2011, and I have administered elections in Denver while serving in other roles since 2005. Specifically, I served as Deputy Director from 2008 to 2011, and Operations Manager and Coordinator for the Denver Elections Division from 2005 to 2008.
4. In addition, I serve on state and national working groups and committees on election administration, including the Council of State Government's Overseas Voting Initiative's Technology Working Group and the Advisory Committee of the MIT Election and Data Science Lab.
5. My biography is attached hereto as Exhibit A.
6. On June 30, 2017, I received from the state election office a copy of a letter sent to them on June 28, 2017 (the "June 28 letter") from the Presidential Advisory Commission on Election Integrity (the "Commission"). The letter asked state officials to provide, to the extent they were "publicly available" under state law, "the full first and last names of all registrants, middle names or initials if available, addresses, dates of birth, political party (if recorded in your state), last four digits of social security number if available, voter history (elections voted in) from 2006 onward, active/inactive status, cancelled status, information regarding any felony convictions, information regarding voter registration in another state, information regarding military status, and overseas citizen information."
7. Citizens in Denver may withdraw their voter registrations by submitting a request, in person, by mail, or by email, to my office. Individuals also may withdraw their registrations through an online form by entering their name and birthdate as it appears on

their voter registration card, along with a Colorado driver's license or ID card number or the last four digits of their Social Security number.

8. My office maintains a database of voter registrations and withdrawals. After my office began to experience an increase in voter registration withdrawals in July 2017, we reviewed the data regarding how many voters had requested to withdraw their registration. We tracked the withdrawals daily and compared the data to previous years and previous months. This is consistent with our approach to quantify and track what appear to be dramatic changes in voter registration data to ensure that we can analyze and review the trends carefully. This analysis enables us to consider public communication options or educational opportunities for voters.
9. I asked my team members to use the data to create a visual presentation. They then entered the data collected into PowerBI, a data visualization software program, in order to create a graphic illustrating the number of voter de-registrations in 2016 and 2017.
10. A chart showing de-registrations by week during comparable periods in 2016 and 2017 is attached hereto as Exhibit B.
11. What I learned through evaluating this data is that following the June 28 letter and resulting news coverage of the Commission's request for voter data, there was a significant increase in the number of voters seeking to withdraw their registrations.
12. In the first week of July 2017, for example, a total of 256 individuals withdrew their voter registrations. By comparison, a total of 10 de-registrations occurred during the same week in 2016.
13. During the second week of July 2017, the number of de-registrations increased to 458. There were 7 de-registrations during the same week in 2016.
14. My office recorded a total of 931 voter registration withdrawals during July 2017. There were only 29 withdrawals in July of the previous year. The July 2017 withdrawals represent a 3,110% increase from July 2016.
15. My office's interaction with citizens also increased significantly following the June 28 letter. My office maintains records of interactions with citizens who contact the office in person, by phone, or by email. During the first week of July 2017, we recorded 331 citizen interactions, compared to 2 at the end of June. We fielded a total of 637 inquiries from Colorado citizens during the month of July 2017.
16. My office received comments from citizens after the June 28 letter gained widespread publicity, and a number of those comments indicated that a decision to de-register was connected, at least in part, to the Commission's request to the states for voter information.

17. Several of these comments from voters were published in a column that I wrote for the *Denver Post* on July 10, 2017.¹
18. One commenter said, “I have concerns that my individually-identifiable information would be misused for illegitimate purposes. I sincerely hope that the Denver Elections Division does not support, or respond to, any such requests involving private information in the future.”
19. Another commenter said, “I am officially requesting that you DO NOT release my name to the federal government, in terms of my act of voting, or my voting record, or any information at all. Voting should remain a citizen’s private duty, and there is no need to do this.”
20. Another said, “Due to the decision to have my information given without my permission, I would like to have the form sent to me that allows me to unregister as a voter. Please send ASAP.”

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


Amber McReynolds
Executed this 20th day of November, 2017

¹ Amber McReynolds, *Trump’s Voter Commission Is Frightening Away Denver Voters*, Denver Post (July 10, 2017), <http://www.denverpost.com/2017/07/10/trumps-voter-commission-is-frightening-away-denver-voters/>.

Exhibit A

Denver Elections Division

Office Of The Clerk & Recorder



Amber McReynolds
Director of Elections

Amber McReynolds is the Director of Elections for the City and County of Denver, Colorado. Amber has administered elections in Denver for 12 years and has worked in public policy and administration for over 16 years. Among her peers, Amber is nationally recognized as a strategic planner, creative thinker, and problem-solver; she is valued, praised, and relied upon for her leadership, innovative thinking, project management expertise, and fiscal responsibility.

In Denver, Amber is focused on continual process improvement which includes implementing innovative solutions to improve the voter's experience. Under her leadership, the Denver Elections Division has earned national awards from the Election Center and the National Association of Counties for Ballot TRACE (a first-in-the-nation ballot tracking, reporting, and communication engine), iAPP (iPad Accessibility Pilot Project), and eSign (a first-in-the-nation Digital Petition and Voter Registration Drive Application). Denver has also been recognized by the International Centre for Parliamentary Studies and received International Electoral Awards for Ballot TRACE and eSign. In addition, the Denver Elections Division has released other innovative solutions including the Denver Votes mobile application, enhanced contextual and behavioral marketing strategies to encourage civic engagement, interactive customer service platforms, and implemented a new voting system in 2015.

Amber is tirelessly committed to conducting fair, accessible, secure, transparent, and efficient elections. She believes in empowering her team to think creatively, lean processes, and develop solutions to enhance overall service. Amber currently serves on the Council of State Government's Overseas Voting Initiative's Technology Committee, Advisory Committee of the MIT Election and Data Science Lab, and various statewide and national committees and working groups. She has also served as an election expert witness, assisted with legislative and policy development, and has been invited to participate with various national and state professional organizations to identify and implement best practices in election administration. Denver has become a national leader in election management and innovation and officials from around the country and the world visit regularly to learn best practices.

Amber enjoys spending time with her family and loves to ski, read, golf, play music, and especially enjoys her role as a mother to her young children.

PROFESSIONAL EXPERIENCE

- Director of Elections, Elections Division, City and County of Denver (2011-Present)
- Deputy Director of Elections, Elections Division, City and County of Denver (2008-2011)
- Operations Manager/Operations Coordinator, Elections Division, City and County of Denver (2005-2008)
- Regional Project Manager, New Voters Project, Des Moines, Iowa (2004)
- Program Director, 14th Judicial Circuit, State of Illinois, (2002-2004)
- Parliamentary Research Associate, United Kingdom Parliament - UK Solicitor General, Rt. Hon. Harriet Harman, QC MP, London, England (2000-2002)

EDUCATIONAL QUALIFICATIONS

- Masters of Science - Comparative Politics, London School of Economics & Political Science, 2002
- Bachelor of Arts - Political Science and Speech Communications, University of Illinois, 2001

PROFESSIONAL CERTIFICATIONS

- Certified Elections/Registration Administrator (CERA), Election Center (2010 - Present)
- Certified Colorado Election Official (2007 - Present)
- GOALS Program, City and County of Denver

PROFESSIONAL MEMBERSHIPS & COMMUNITY LEADERSHIP

- Leadership Denver 2016-2017, Denver Leadership Foundation
- Board of Directors, Montessori Academy of Colorado
- Advisory Committee, MIT Election Data and Science Lab
- The Election Center (National Association of Election Officials)
- International Association of Government Officials (IGO)
- Colorado County Clerks Association
- Denver Metro Chamber of Commerce
- Project Management International
- Alumni and Friends of the London School of Economics USA
- University of Illinois Alumni Association
- Mentor - Humphrey School of Public Affairs - University of Minnesota

STRATEGIC INNOVATIONS

- Ballot TRACE (Ballot Tracking, Reporting, and Communication Engine)
- Enhanced Ballot Access Program for UOCAVA Voters
- iAPP (iPad Accessibility Pilot Project)
- Denver Votes Mobile App
- eSign (Electronic Signature Image Gathering Network & VRD App)
- New Voting System (May 2015)



Denver Elections Division
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Download the app
today at
DenverVotes.org!



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DenverVotes.org

Exhibit B

Withdrawals for Heather WITHDRAWS BY WEEK

