

EXHIBIT A

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

COMMON CAUSE,

Plaintiff,

v.

PRESIDENTIAL ADVISORY
COMMISSION ON ELECTION INTEGRITY,
et al.,

Defendants.

Case No. 17-1398 (RCL)

DECLARATION OF JAN CANTLER

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

1. I reside in Brooklyn, New York where I am retired from retail marketing and work as a literacy tutor for adolescents in a public school afterschool program.
2. I hold a Bachelors of Arts from Vassar College and, prior to my retirement, worked for more than 30 years as a business executive overseeing, among other things, data management for prominent retail organizations.
3. I am a volunteer organizer and member of Common Cause New York.
4. I am a registered voter and I frequently participate in the political process through voting in elections. I express my political views through, among other things, casting my vote in elections.
5. I am aware of the Presidential Advisory Commission on Election Integrity's request for my personal data, such as my birthdate and address, as well as data

concerning my voting history and party affiliation. I am also aware of the investigation it is conducting of eligible, American voters.

6. Facing a high level of concern over the Commission's request for my and other Americans' personal data, in the summer of 2017, I called Mr. Kobach's office in Kansas to seek to persuade the Commission and Mr. Kobach to change its course. I called the Secretary of State's Office in Kansas in an attempt to reach Mr. Kobach. Yet, I was not connected to Mr. Kobach. Instead, I was connected to someone in the Secretary of State's office. I made clear that I was not a Kansas constituent and voiced my concerns regarding the Commission.

7. The individual that I spoke to in the Kansas Secretary of State's Office rebuffed my concerns and told me that the data that was being collected was "public data." I explained to him, however, that the data that the Commission was directing states to provide was not the type of data that could be accessed by the general public without going through certain steps and meeting certain criteria. I also explained that the matching logic that the Commission is using to cross check voter data could lead to inaccurate and problematic results, including misidentifying eligible voters as ineligible. The individual I spoke to continued to rebuff my concerns.

8. When the Commission first requested my and other New York residents' data, the Governor of our state said that New York would not disclose the personal and voter data of its citizens.

9. After Governor Cuomo's decision, the Commission submitted a revised request to the New York State Board of Elections. My understanding is that New York state may only provide data when it is used for an "election purpose" and so, based on the

Commission's request for this data, I understand the Commission to be seeking data for it to be used in elections.

10. In response to its request to the New York State Board of Elections, the Commission received my voter history, including my party affiliation, and personal data from the New York State Board of Elections.

11. As such, the Commission is in possession of my personal data, including data that contains information about my First Amendment activities.

12. I did not and have never consented to such disclosure.


13. The Commission's request for and collection of my data and the data of millions of my fellow citizens undermines my confidence in our electoral system and hinders my ability to participate in the political process without fear of the federal government cataloguing data regarding my First Amendment activities.

14. I have and continue to be injured by the Commission's actions: they are an invasion of my personal privacy, they put my personal data at risk for theft, and they hinder my ability to fully participate in the political process without fear.

15. In addition, there is a substantial risk that the collection of voter data, including voting history and party affiliation, will lead to suppression of my vote and the votes of many other eligible voters. 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 and/or other eligible voters' names to be removed from the voter rolls.

16. As someone who has experience in data management and security, especially of personally identifiable information, I have a heightened awareness of how data hygiene and matching logic can cause harm. The Commission also has not been forthcoming regarding where my personal and voter data is being stored and what steps are being taken to ensure that it is secure, putting it at risk for additional improper uses and theft. I swear under penalty of perjury that the foregoing is true and correct.

Executed this __ day of November 27, 2017.



Jan Cantler