

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF PENNSYLVANIA**

DONALD J. TRUMP FOR PRESIDENT,
INC., *et al.*,

Plaintiffs,

v.

KATHY BOOCKVAR, in her capacity as
Secretary of the Commonwealth of
Pennsylvania, *et al.*,

Defendants,

No. 2:20-cv-00966-NR

DECLARATION OF TERRIE E. GRIFFIN

Pursuant to 28 U.S.C. § 1746, I, Terrie E. Griffin, hereby declare as follows:

1. I have personal knowledge of the matters stated herein and would testify to the same if called as a witness in Court.
2. I am over eighteen years of age and am otherwise competent to testify.
3. I am the Co-President of the League of Women Voters of Pennsylvania. I have served in that role since June 2019
4. I am also a member of the League of Women Voters of Allegheny County and have served on their board for several years and served as chair of the membership committee.
5. League of Women Voters of Pennsylvania (“LWV-PA”) is a nonpartisan nonprofit organization that encourages the informed and active participation of citizens in government, works to increase understanding of major public policy issues, and influences public policy through education and advocacy.

6. LWV-PA supports full voting rights for all eligible citizens and opposes efforts to build barriers to exercise this right.
7. LWV-PA has approximately 2,273 members, who are at risk of being disenfranchised in future elections if Plaintiff is successful in this litigation.
8. LWV-PA works in the areas of voter registration, election protection, voter education, get out the vote, and grassroots mobilization around voting rights.
9. LWV-PA's members include voters at risk of not being able to vote by mail or absentee ballot if mail ballot drop boxes are eliminated as a result of this litigation, which could leave county boards of elections' offices as the only place at which voters may deliver mail or absentee ballots in person.
10. Some of these affected members of LWV-PA will be seniors or have compromised immune systems, or have family members who are seniors or have compromised immune systems. For these affected members, voting in person may not be a realistic option.
11. For the June 2020 primary election, LWV-PA's voter education efforts included informing members of the public about the availability and locations of mail ballot drop boxes by email, on its website, on social media, and through outreach to traditional media.
12. If mail ballot drop boxes are eliminated, LWV-PA will have to divert its resources to educate voters about changes to the mail voting process. LWV-PA would also have to assist and respond to questions from voters who used mail ballot drop boxes for the June primary election. LWV-PA will also have to divert resources to working with county election officials to ensure that their offices are prepared to receive and process additional numbers of absentee ballots at county board of elections' offices.

13. Similarly, if mail ballot drop boxes are eliminated, LWV-PA will not only have to change its messaging to voters about the availability of mail ballot drop boxes, but will also have to divert considerable resources from its ongoing election protection, advocacy, and get out the vote efforts to educate and assist eligible voters, including its members. Many of these voters will not be able to vote in person on Election Day and will also not be able to travel to a county board of elections office to drop off their mail or absentee ballot in person. Many of these voters will not be able to mail their absentee ballot back to the board of elections in time for the ballot to be counted.

14. LWV-PA has an interest in preventing the disenfranchisement of eligible voters who wish to vote by mail or absentee ballot in the midst of the COVID-19 pandemic, including its members and voters it may have assisted in navigating the registration process.

15. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 14 day of July, 2020, in Pittsburgh, Pennsylvania.


Terrie E. Griffin