

# EXHIBIT I

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

CITIZENS FOR CONSTITUTIONAL  
INTEGRITY,

Plaintiff,

v.

THE CENSUS BUREAU, *et al.*,

Defendants.

No. 1:21-cv-3045

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**MICHAEL CARR DECLARATION**

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1. My name is Michael Carr, and I reside in Alexandria, Virginia. I am a member of Citizens for Constitutional Integrity. I have resided in Virginia since 1994. I voted in the 2020 election, and in every election that I can remember. I plan to vote in the 2022 election and in future elections.

2. Across the United States, I see states making it harder and harder for citizens to vote. States have traditionally used registration requirements to disenfranchise the voters they did not want voting—most often based on race. I understand that the Fourteenth Amendment requires the Census Bureau and the Department of Commerce (the Agencies) to analyze state denials and abridgments of citizens' right to vote. When distributing seats in the U.S. House of Representatives, I understand the Agencies did not complete that analysis or calculate the basis of representation for states that make voter registration or voting more difficult.


3. The Framers intended the Fourteenth Amendment as an indirect measure to encourage states to ensure universal right to vote for all citizens. I expect that, if the Agencies completed the analysis the Fourteenth Amendment required, states would make it easier to register to vote

and to vote, so they could retain the full number of representatives to which their entire population entitles them.

4. In the meantime, I live in Virginia, and a larger proportion of Virginia citizens can vote than in many other states, so if the Agencies completed the analysis the Fourteenth Amendment requires, I see some possibility that they would have allocated Virginia an additional seat. I would rather Virginia have that seat than some state that disenfranchises its voters. Right now, Virginia has fewer seats than the Fourteenth Amendment entitles it to, and I am injured by my vote dilution. I want the Agencies to complete the analysis that I understand the Fourteenth Amendment requires.

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

Executed on 13 Jan 2022.

  
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MICHAEL CARR